

96-53

**DOT/FAA PROPOSED NEW POLICY FOR AIRPORTS IN
THE METROPOLITAN WASHINGTON AREA**

(96-53)

HEARINGS
BEFORE THE
SUBCOMMITTEE ON AVIATION
OF THE
COMMITTEE ON
PUBLIC WORKS AND TRANSPORTATION
HOUSE OF REPRESENTATIVES
NINETY-SIXTH CONGRESS
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DOT/FAA PROPOSED NEW POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

WEDNESDAY, JUNE 11, 1980

**HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON AVIATION,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
Washington, D.C.**

The subcommittee met, pursuant to notice, at 10:23 a.m., in room 2167, Rayburn House Office Building, Hon. Glenn M. Anderson (chairman of the subcommittee) presiding.

Mr. ANDERSON. The meeting of the Subcommittee on Aviation will please come to order.

Today we begin hearings on the Federal Aviation Administration's proposed new policy for airports in the Metropolitan Washington area.

In formulating a Washington airport policy, the FAA must reconcile a number of competing interests which are not always fully compatible. The competing interests include the desire of the airlines and their passengers for service at convenient close-in National Airport, and the sometimes conflicting desire of homeowners near the airport to reduce the noise created by National's operations.

Another important factor is the interest of the Federal Government in insuring development of Dulles Airport, which has fallen far short of the levels of traffic anticipated when the airport was opened.

On the other hand, restrictions designed to force the airlines to use Dulles may be inconsistent with the spirit of the Airline Deregulation Act. An additional factor which FAA must consider is the capacity of National Airport and the air traffic control system to handle increased operations.

The FAA now imposes a number of restrictions on operations at Washington National Airport. These include a limitation of approximately 60 flights per hour during instrument flight rule conditions, a limitation on air carrier jet operations to two- and three-engine, narrow-bodied aircraft, and a perimeter rule under which air carrier nonstop service is limited to cities within 650 miles, with the exception of seven "grandfather" cities.

In January 1980, the FAA issued a notice of rulemaking proposing to modify these restrictions. The supporting documentation indicates that the main purposes of the modifications are to encourage the further development of Dulles and Baltimore-Washington Airports, and to reduce the impact of noise from operations out of National Airport.

A key provision in the FAA's proposal would place a limit of 18 million annual passengers at National Airport, compared to the 1979 traffic of approximately 15 million passengers. Hourly operations at National would be limited to meet this goal.

Other important provisions in the proposal would allow the use of wide-bodied two- and three-engine jets at National and impose a 9:30 curfew on air carrier operations. The FAA is also considering increasing the perimeter for nonstop service to 1,000 miles.

At our hearings we intend to give full consideration to FAA's proposals. We will consider whether the objectives underlying the proposals are proper and whether the FAA's proposals are the best way of achieving them.

Other issues in the hearing will include the desirability of continuing to have National and Dulles Airports operated by the FAA, and the adequacy of existing mechanism for funding airport maintenance and police protection.

Our hearings on this issue have attracted widespread interest and a large number of witnesses have asked to appear.

To give all scheduled witnesses a fair opportunity to present their views, we are asking witnesses to limit their oral presentations to 5 minutes.

Longer written statements will be made a part of the record of the hearing.

Mrs. Bouquard?

Mrs. BOUQUARD. Thank you very much.

I would first like to thank you for holding hearings on this matter so that all interested parties might have the opportunity to express their concerns and varied interests.

I assume the decision by this subcommittee to hold hearings is an indication that this issue is being viewed as one with nationwide effects and not simply as a local issue.

In further support of this view over 60 of our colleagues joined with me on a resolution which I introduced yesterday to express the sense of the House of Representatives in opposition to any action which would result in a reduction of flights into Washington National Airport.

Many communities around the country have been adversely affected since the passage of the Airline Deregulation Act by dramatic reductions in service to desperately needed markets.

My district, Chattanooga, Tenn., is in a position of having no direct flights into the northeastern corridor of our Nation, and I fear that those current proposals will further erode available service to the medium-size communities who so desperately need service into the downtown Washington market.

While I can understand the desire to increase usage at Dulles International Airport, I feel that we should insure that communities across the country who need service into downtown Washington are not forced to shoulder this burden.

Presently, there is no adequate transportation to rapidly transport individuals into Washington. Airlines have traditionally chosen to fly into National rather than Dulles because their passengers desire to be in Washington, not miles away.

So it makes no sense to me to force our planes to fly into Dulles until adequate transportation for passengers can be provided. Ac-

ording to the FAA's own estimates, as published in the Federal Register of January 21, 1980, those regulations will result in a reduction of 118 potential certificated air carrier operations into Washington, or a reduction of 18.6 percent.

Also, there is no guarantee that would affect any city or prevent any city or region of the country from receiving a significant number of reductions. I believe these regulations would further preclude the availability of service to those communities who have been so desperately fighting for service into downtown Washington and all of the Northeast corridor.

The industries in these communities are in dire need of this service, and I fear these proposals could well result in this access being denied.

Another issue which will be raised during these hearings is that of the noise level at Washington National Airport.

This airport has been located in its present location since 1941, and surely any development that was done in the surrounding area was done with the location of the airport in mind. It is not that I am insensitive to the concern raised by the noise level questions, but it is just that many medium size communities, including those in my district, who suffer severe economic setbacks as a result of the loss of badly needed air service, and I cannot support actions that will continue this trend.

It is estimated there are approximately 100,000 to 150,000 people within the areas affected by the noise level. I fear there are many communities across the Nation who stand to be hurt by the implementation of these proposals, and I would like to urge the members of this subcommittee, as well as the Secretary of Transportation, to carefully look at these proposals keeping in mind the need to protect the interests of all of the communities of our Nation.

Thank you, Mr. Chairman.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you; I do have a statement, but I would suspect that the panel before us, the members here, have tight schedules and places to get to.

I ask unanimous consent that I be permitted to insert my statement into the record this morning, so we won't take the valuable time of these members.

Mr. ANDERSON. No objection; so ordered.

[Mr. Snyder's statement follows:]

STATEMENT OF HON. GENE SNYDER

As the chairman has indicated, these hearings will focus on the Federal Aviation Administration's proposed policy affecting the operation of Washington National and Dulles International Airports. While I look forward to hearing the views of those affected by these proposals, I am concerned that their adoption will adversely affect air service between National and those cities (such as Louisville and Cincinnati) which are currently eligible to receive non-stop service.

Under either alternative proposed, the number of hourly air carrier slots would be reduced from 40 to 36 and the number of hours of scheduled operations would also be reduced. This would result in a reduction in the number of daily air carrier slots from 640 to 522, a decrease of 18.6 percent. In addition, one of the proposals would also expand the existing 650 mile perimeter rule to 1,000 miles, thereby making additional cities eligible for non-stop service into National.

While I cannot say with certainty that Louisville or Cincinnati will experience a decrease in non-stop service to National Airport, it is obvious that the decreases will occur in some markets if these proposals are adopted. It is doubtful, however, that there will be any decreases in frequency in high density markets such as Chicago,

New York, Boston, Pittsburgh and Atlanta. On top of the reduction in slots, there will be added competition for remaining slots from new major points such as Kansas City, New Orleans, Birmingham and Fort Lauderdale.

Cities within a 650 mile radius of Washington National (both Louisville and Cincinnati are less than 500 miles) are close enough to be "commuter" markets. That is, a trip may be made in the market, a relatively full day of work accomplished and a return home is possible within the same day.

In more distant markets, that generally is not the case. Therefore, expanding the radius to 1,000 miles does not significantly increase convenience to travelers in the affected local markets, since overnighing will still be required to accommodate a full work day. On the other hand, if cities situated like Louisville or Cincinnati are squeezed out and forced to use services into Dulles Airport or BWI, the total trip time is so lengthened as to effectively eliminate those cities as commuter markets.

While I can appreciate the FAA's concerns over the traffic growth at National and the excess capacity at Dulles, I believe these can be addressed by maintaining the air carrier and general aviation slot allocations at existing levels. Since it is the air carrier aircraft which are responsible for most of the noise, leaving the allocations as they are today would not result in an increase in noise. In fact, allowing 2- and 3-engine wide-bodied aircraft to use the airport, when combined with the introduction of stage 3 aircraft into service, will significantly reduce noise without cutting back on the number of slots for these aircraft.

I also believe that the FAA should carefully evaluate the merits of increasing slots available to commuters even if this would require total hourly slots to be increased beyond the present level of 60. This would accommodate the commuter demand without increasing noise, since commuter aircraft do not pose a noise problem to the surrounding communities. In addition, it would have the advantage of maintaining the status quo for air carrier and general aviation users. For these reasons, FAA should give this careful consideration, provided safety would not be adversely affected.

Mr. Chairman, I look forward to hearing from members of Congress, the aviation community, and from local community leaders on the pros and cons of the FAA proposals. Hopefully, these hearings will assist all concerned in assuring a balanced policy which not only takes into consideration the needs of community, but also tries to accommodate the millions of air travellers who so desperately need a viable National Airport.

Mr. ANDERSON. I also have a statement from our colleague from West Virginia, Mr. Rahall.

[Mr. Rahall's statement follows:]

STATEMENT OF HON. NICK JOE RAHALL, A REPRESENTATIVE IN CONGRESS FROM
THE STATE OF WEST VIRGINIA

This hearing, and the ones to follow in the next week, are providing an important opportunity for the Congress to review the proposed policy of the Federal Aviation Administration for Washington, National Airport. I want to take this time to identify the issues as they affect my Congressional District in southern West Virginia.

I know I am not alone in expressing a concern that reduced service to Washington National Airport will most strongly affect small cities in close proximity to the Nation's Capital. My home State of West Virginia has already suffered a great deal from airline deregulation, so that they are already struggling to keep airline service to major cities. Elimination of slots for short-haul traffic to Washington will most certainly have a direct and devastating influence on West Virginians. Washington is not only a major destination point for many, but is also a major connecting link for other travelers.

In the last year, West Virginia has lost not only much air service due to airline deregulation, but has also lost a good percentage of its passenger train service. It is imperative that we not be isolated. In the three and one half years that I have served in Congress, the price of airline transportation to my District from Washington has nearly doubled, and if further service to the State is curtailed, you can well imagine that the price will go up even more. In these days of high inflation, and fiscal responsibility, this is a very great burden to impose on the average consumer.

I am acquainted with Dulles and Baltimore-Washington Airports, and they are fine facilities which certainly should have increased usage. However, the lack of good ground transportation from those sites into downtown Washington, doubles travel time for someone flying to Washington, from Charleston, West Virginia.

Besides this great inconvenience, Dulles and BWI do not offer nearly the possibility for connections to other cities than National Airport does.

It is important that we hear both sides of this issue, as the concerns of local residents in the Washington area are important. However, we must not lose sight of what we would lose by reducing air service to Washington National Airport.

I would also like to submit for the record of this hearing the letter sent to me by West Virginia Governor Jay Rockefeller, which further elaborates on the problems this action would cause our State.

STATE OF WEST VIRGINIA,
OFFICE OF THE GOVERNOR,
Charleston, W. Va., June 9, 1980.

HON. NICK JOE RAHALL,
Member, U.S. House of Representatives,
Cannon House Office Building, Washington, D.C.

DEAR NICK: I understand that the House Aviation Subcommittee is going to hold a hearing on FAA's proposed Washington National Airport Operating Policy on June 11. I know that you share my concern over the continued decline of air service in West Virginia. The FAA Washington National Policy disturbs me in that it could result in a further loss of service between the very important Washington market and points in our State.

West Virginia's air service would be severely impacted by reductions in operating hours at Washington National Airport if these reductions result in a cutback in the number of slots available to air carriers operating directly from West Virginia communities or indirectly through other West Virginia hubs. The need for timely and efficient air service to the Nation's Capital cannot be overstated. Important government and commercial transactions could not take place without this service.

With the advent of air deregulation, major carriers have discontinued service to West Virginia points in favor of longer routes with higher load and profit factors. West Virginia's proximity to Washington National does not place it in a favorable comparative position to more distant States which are able to benefit from long-haul routes. Airlines, if given the choice, will operate on the more profitable, long route. Therefore, if FAA reduces the number of slots available to each carrier and allows the carrier the option of selecting which slots it will utilize solely on the basis of profitability, then service between West Virginia and Washington National could be eliminated or, at the least, unnecessarily circuitous.

The number of flights between West Virginia points and Washington National is not great; therefore, any reduction in the number of flights could be viewed as a serious service loss. If the operations reductions at Washington National eventuate, FAA should not permit a carrier to drop a slot that would eliminate travel from a West Virginia point or make travel to and from Washington unduly circuitous or time consuming.

The Dulles and Baltimore-Washington International Airports would certainly experience increases in traffic from any operations reductions at Washington National. Due to ground transportation difficulties, carrier service from either of these airports to West Virginia points has the disadvantage of doubling the trip time between West Virginia and the City of Washington. Dulles-BWI traffic diversion would have the additional disadvantage of limiting the connecting options of through passengers.

The admission of larger jet aircraft to Washington National raises another issue important to West Virginia. These larger jets are best suited to serving the needs of long-haul markets. Since West Virginia points do not fall into the long-haul category, disproportionate increases in large jet over regular jet traffic will severely constrain service to West Virginia points and, in some instances, eliminate jet service. The imposition of an 18-million passenger ceiling in conjunction with the admission of large jets has the potential for further constraining West Virginia air access to National Airport.

This proposed policy places a limit at National of 18 million passengers, and mandates reduced slots to maintain this ceiling. Again, the slot reductions would require some flight eliminations or drastic price increases, neither of which is desirable; those eliminations or price increases will fall to those short-haul routes that cannot generate a competitive volume of traffic.

In establishing its national policy, FAA should attempt to guarantee a combination of large and regular jet operations that will ensure continued service to West Virginia points.

Nick, West Virginia is facing some critical aviation problems. Your position on the House Aviation Subcommittee is invaluable to the State in its effort to over-

come these problems. I am confident that our aviation interests are well served by you and that you will convey our concerns to the Aviation Subcommittee on June 11.

Sincerely,

JOHN D. ROCKEFELLER IV.

Mr. ANDERSON. Any further statements here before we take up the congressional panel?

Mrs. Holt has asked to go first.

She has an appointment at another committee.

I am going to recognize you in a moment.

I wasn't going to ask any questions of the congressional panel until everyone got through; but I do have two questions I will specifically address to you, and then we will let you go. Hopefully most of the members of the panel can stay so we can get our questions directed together.

We are very pleased to recognize our colleague from Maryland, Marjorie S. Holt.

Mrs. Holt, the full text of your prepared statement will appear in the record at this point.

[Statement referred to follows:]

STATEMENT OF HON. MARJORIE S. HOLT, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF MARYLAND

Mr. Chairman, I appreciate having the opportunity to comment on whether service into National Airport should be restricted or expanded. The Federal Aviation Administration is proposing further growth at National, with restrictions on the growth rate. I oppose any further expansion of operations at the airport and in fact must advocate some restrictions on present operations. Since I first came to Congress in 1973, I have received hundreds of complaints every year about aircraft noise generated by planes using National. My constituents who live on or near the shores of the Potomac River in southern Prince Georges county tell me that in the past two years the overflights have become much more numerous and the impact more serious. Residents fear for their health and safety and they perceive that the value of their property is declining because of the noise and frequency of the aircraft. During the years I have made many serious efforts to work out an equitable solution to the problem with FAA officials, repeatedly telling them that if the departing aircraft would stay out over the middle of the river until making their turns my constituents could live with the traffic.

Most recently, in April, I pointed out to the present Director of the Metropolitan Washington Airports that departing planes could be kept safely out over the river by a simple change in the departure radial shortly after takeoff. Director Wilding shot that proposal down, stating that approximately one-third of the departures in a south operation turn east over Maryland, while two-thirds turn west over Virginia. What Mr. Wilding avoided mentioning was the fact that almost one hundred percent of all south-departing flights fly over land in my constituency before making their turns to the east or west. The noise impact is from directly overhead and not from the side as it is at Old Town, Alexandria. Because I am completely frustrated with the FAA's refusal to mitigate the problem, I suggest that perhaps the only solution is to reduce traffic at National, compatible with the balanced needs of Maryland and Virginia for access to airports.

Mr. ANDERSON. Please proceed.

TESTIMONY OF A PANEL: HON. MARJORIE S. HOLT, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF MARYLAND; HON. JOHN A. WARNER, U.S. SENATOR FROM THE STATE OF VIRGINIA; HON. JOSEPH L. FISHER, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF VIRGINIA; HON. MICHAEL D. BARNES, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF MARYLAND; AND HON. HERBERT E. HARRIS II, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF VIRGINIA

Mrs. HOLT. We certainly appreciate your having these hearings. I do appreciate the need of the gentlelady from Tennessee; and the need of the 60 Members for a quick way to get to the Capitol, but I think this is really a serious problem, and I would like to urge the Secretary of Transportation and this subcommittee to look at it really carefully, because in the time that I have served here in the Congress I have seen this nuisance increase.

It is not that people have moved into developments knowing that the airport was there. People in my district tell me that during the past 2 years the overflights have become much more numerous and the impact more serious, so I think it really is creating a real problem and should be looked at very, very carefully.

I certainly oppose any further expansion of operations at the airport. We have tried to work out flight patterns with FAA. We have met with FAA representatives many times trying to work out some equitable and after consultation with many experts, including pilots. Most recently we suggested to the director of the airport that the departing planes could be kept safely out over the river by a simple change in the departure radial shortly after takeoff.

They shot that proposal down stating that approximately one-third of the departures in the south operation turn east over Maryland while two-thirds turn west over Virginia, but they don't take into consideration the fact that almost 100 percent of all south departing flights fly over land in Maryland before making their turns to the east or west.

The noise impact is from directly overhead and not from the side, as it is in Old Town, Alexandria. So we in Maryland are completely frustrated with the FAA's refusal to try to alleviate the problem and work out some way that we can live with it.

If traffic is increased or enlarged, we are going to have very serious health problems, deterioration of property values, all sorts of negatives and I think that we can work out transportation through other means.

I think that this is not the only way to go.

I thank you very much.

Mr. ANDERSON. Your concern seems to be primarily with a number of operations at National Airport.

Can we interpret this to mean that you have no objection to the use of quieter, wide-bodied aircraft, and that you are not particularly concerned about how many million passengers flow through the airport so long as the number of operations is not increased or is actually reduced?

Mrs. HOLT. I think that would be a fair statement, but I am very, very concerned about agreeing to anything, because I have had no concessions at all from FAA, or from the director of the airport.

They don't listen to reason. The director there blames the overflight on the controllers. The controllers say the pilots don't follow the proper flight pattern, so I think it is a tremendous problem, and I trust that this committee will look into it carefully and will not make any concessions that are going to increase the nuisance.

Mr. ANDERSON. You refer to reducing operations at National, "compatible with the balance of needs of Maryland and Virginia for access to the airports," that is to Dulles and Baltimore-Washington International.

Could you elaborate on what you mean by balanced need for access?

Mrs. HOLT. Certainly; nobody wants to say we want to close the airport down. We have a lot more potential at Dulles that could be developed. I think that it would be far more sensible to provide public transportation, shuttle transportation that could provide access to Dulles and try to move in that direction.

I think it has to be balanced. You can't be unreasonable about it, but at this point there has been no reason. There has been no consideration for the constituents in my area in Maryland.

Mr. ANDERSON. Thank you.

Those are the two questions I have of you, and I know you have to leave.

Mrs. HOLT. Thank you very much.

Mr. SNYDER. I am not going to ask you anything. I appreciate your coming. You indicated that you have seen the problem increase since you came into Congress and I assume basically you meant the noise problem to your constituents?

Mrs. HOLT. Yes; there are all sorts of complaints.

Mr. SNYDER. I want to observe that the existing regulations which allow 60 operations, which are air carriers, have been in existence since April of 1969, so the problem shouldn't have gotten any worse.

Mrs. HOLT. That is true, but it is the route that is taken.

Mr. SNYDER. They have the Mt. Vernon or the river approach, depending on whether they come from the north or south.

Mrs. HOLT. I disagree; if they stay in the middle of the river—

Mr. SNYDER. I know you have to go. You tell me how the planes ought to come that would be better than the river approach or Mount Vernon approach.

Mr. ANDERSON. Thank you.

Mrs. BOUQUARD. I thank our lovely colleague for being with us, and we disagree on a warm basis.

Mrs. HOLT. Thank you very much.

Mr. ANDERSON. At this time we recognize the distinguished Senator from Virginia, Senator Warner.

Senator WARNER. Thank you, Mr. Chairman.

I wish to express my appreciation to Mr. Snyder for his thoughts about expediting the hearing.

The Senate has been up all night long, and we just go from night to day, so time really doesn't make much difference.

Mr. SNYDER. The Senator from Arizona's son just reminded me about the time he will start working over there.

Senator WARNER. I can assure the distinguished Member from California that his father was heard loud and clear well into the night.

The subject was including women and draft registration, a subject dear to his heart.

As a Senator from the Commonwealth of Virginia, I wish to thank you for the opportunity to appear today in order to express my views on the operation of Washington National Airport.

This is Virginia's principal airport and its operations directly impact on my constituents on a wide range of issues, especially safety, statewide air service, noise levels and employment.

In northern Virginia, safety is a paramount consideration. Safe noise levels and safe airport operation directly affect the quality of life experienced by those Virginians residing within a wide radius of the airport.

Further, National Airport renders "hub service" to many Virginia cities. Any loss of access flights would most severely impact those smaller cities where the frequency of air service already is limited.

Today, almost two out of three Virginia passengers depend on Washington National as their vital connecting link to the Nation's air transportation system. Washington also is a top destination from every one of these Virginia cities.

In my judgment, all of these concerns can be met by a reduction in the number of takeoff and landing slots which are now allocated to certificated air carriers operating in long-haul markets.

Long-haul cities would still be able to preserve their service quality at Washington National because the reduced frequency can be offset by the increased capacity of the quieter big jet service which would be permitted.

In any event, some of the service to these long-haul markets could be transferred to Dulles Airport, if necessary, without substantial impairment of service quality, because the ration of surface-to-air time would still be reasonable.

The Federal Aviation Administration has proposed to change hourly operation allocations from the present 40 per hour for air carriers, 8 for commuter air carriers, and 12 for general aviation, to 36 per hour for air carriers, and either 12 for commuters and 12 for general aviation, or 15 for commuters and 9 for general aviation.

I believe that such a change in the allocation of slots would be beneficial to all concerned. The large air carriers soon will be operating new two- and three-engine wide-body aircraft. These aircraft not only have larger passenger capacities but are significantly quieter than the large jet aircraft now operating at National.

Therefore, the air carriers can absorb a reduction in long-haul frequency without a reduction in passenger totals.

This would also benefit those people residing near the airport with respect to a reduction in noise levels, for aircraft noise is a severe problem. In addition to demonstrated evidence on hearing loss, noise can be a factor in serious health problems.

Changing to new and quieter equipment, along with a reduction of takeoff and landing frequency of large aircraft, could have a significant impact on airport noise abatement.

I share the observation of Mrs. Bouquard that this was built in 1941 but, having been in aviation almost that entire period of my life, there has been a substantial change as you well recognize in the types of aircraft operated today in comparison to those operated in 1941.

National Airport's role as a short-haul airport can be strengthened by reducing the number of slots which are now allocated to air carriers, and assigning them instead of operators of commuter airlines.

Most commuter flights are short in length and because they use smaller aircraft they are able to use airports in many smaller communities not capable of accommodating larger airlines. Having a sufficient number of slots available to commuter lines will enhance the airport's local service role for many of the smaller communities on the east coast that are now denied, I repeat denied, such service because of slot limitations.

The FAA has also proposed a 9:30 p.m. to 7 a.m. curfew for all scheduled operations. While I would support this curfew concept, I urge the FAA to consider shortening the curfew for commuter carriers.

This modification would have little environmental impact because the aircraft used by commuters have noise and pollution characteristics significantly better than those operated by large air carriers.

In addition, since the vast majority of commuter passengers are connecting either to or from air carrier flights, and since there is a 45-minute legal connect time at Washington National for connecting flights, such a provision would have a minimal effect on either the land or air side congestion and the resulting pollution levels at National during curfew hours.

In fact, this provision should actually help to relieve congestion and reduce pollution levels in the 7 a.m. to 8 p.m. period, and again in the 9 p.m. to 9:30 p.m. period.

With respect to the FAA proposal to extend National's perimeter rule to 1,000 miles, I do not believe this would enhance the airport's short-haul function. I would be more favorable toward retaining the existing 650-mile rule without the current "grandfather" exemptions, and I would suggest that the FAA consider the adoption of a multiperimeter-type concept.

Under this type of proposal, we could preserve the short- and medium-haul role of National Airport, but also could allow limited long-haul service.

Furthermore, a concentration of service in short-haul markets would have a beneficial impact on noise and pollution levels both at National and in surrounding communities. This would be due to the fact that the bulk of operations would be conducted by aircraft producing low noise and air pollution levels.

In summary, Mr. Chairman, I favor the FAA's proposed changes in slot allocation which would reduce certificated slots and increase commuter operations, with more weight given to flights to and from short-haul markets.

I also am in favor of the extension of the airport curfew hours proposed for commuter carriers, and I am opposed to extension of

the airport perimeter rule except for a study that would determine whether or not a multiperimeter type policy would be feasible.

All these changes, I believe, are in the best interests of the citizens whom Washington National Airport is designed to serve.

Thank you once again for the opportunity to present my views. I close with this observation; this airport is located in Virginia. It is Virginia's principal airport and, therefore, I think my State and my constituents have a greater interest than any other State in the Union, and I hope this committee recognizes that.

Thank you, sir.

Mr. ANDERSON. Thank you, Senator, for a very fine statement. Can you stay while the other two Congressmen testify?

Senator WARNER. I will do my very best, because this is a subject of great importance to me and my constituents.

Mr. ANDERSON. We will recognize at this time the Honorable Joseph Fisher of Virginia.

Mr. Fisher, the full text of your prepared statement will appear in the record at this point.

[Statement referred to follows:]

STATEMENT OF CONGRESSMAN JOSEPH L. FISHER

Mr. Chairman and members of the subcommittee, I appreciate the opportunity to appear before you to present my views on the proposed policy for the Metropolitan Washington Airports and on the desirability of continuing Federal ownership and operation of the two Metropolitan Washington Airports. As the representative of the Congressional district in which both Dulles and National are located, I am pleased to be able to share with this subcommittee my thoughts on these issues and what I believe to be the views of the majority of the citizens of my district.

The policy is needed in order for the airport operators to plan properly for the future use, development and improvement of the air facilities in the Washington area. Many standards could be used for judging the appropriateness of the proposal. I have several criteria that I have used and would like to share with you. First, the noise and other adverse environmental impacts of National Airport must be significantly reduced. Second, steps must be taken to increase the relative importance of Dulles Airport. Third, the Washington community must be involved in consultations about airport activities and possibly ownership. Other standards could be added to this list, but these are the ones to which I give priority.

How does the proposed policy measure up to my criteria? The policy lists several steps that will have a direct effect on operations at National Airport and that will have indirect effects at Dulles. At National, the number of slots for commercial airline operations will be reduced; the number of passengers served will be allowed to grow by 3 million and then be capped; the hours of operation will be restricted, with all operations stopped between 10:30 p.m. and 7 a.m.; quieter wide-bodied 2 and 3 engine jet aircraft will be permitted into National, once their safe operation there is proven; and a perimeter for nonstop flights will be established. The restrictions at National will lead to some growth at Dulles and BWI. These are all steps in the right direction and an improvement over previous proposals. But I must say that I think the proposal could and should have gone further.

IMPORTANCE OF DULLES

Enhancing the role of Dulles relative to National should be a vital element of any policy for the Metropolitan Washington Airports. The basis for such an effort is contained in the Environmental Impact Statement for the proposed policy. The EIS assumes that the alternative policies under consideration will not affect the 1990 level of passenger demand for air service in the Washington area. Passengers will want to come to the Washington area regardless of whether they land and take off from Dulles or National. That being the case, the policy should take firmer steps to limit the role of National by greater slot reductions than those proposed and by capping passenger growth at a level below the proposed 18 million. The Washington area as a whole will not lose passengers by these steps and the other facilities will benefit.

The EIS contains further evidence that Dulles Airport should play an even greater role in the future than the proposed policy would allow. For example, the EIS points out that nearly 10,000 acres of land were acquired when Dulles was built in order to provide noise buffer zones and make it a good neighbor for the surrounding community. Except at certain peak times, Dulles has considerable excess passenger capacity. In contrast, National is located in a built-up area with no opportunity for the acquisition of vitally needed noise buffer areas. Already its facilities are outdated, overcrowded, and increasingly dangerous. This sort of evidence shows that passengers and the community could be better served at airports other than National.

National Airport is in demand by passengers because that is where the flights are now scheduled. If greater numbers of flights were scheduled at the other airports, the passengers would go there. Although many passengers like the proximity of National to downtown Washington, many others would appreciate the convenience of Dulles to the growing number of businesses and homes in the suburban areas of the region.

The proposed policy states that a perimeter will be established for non-stop flights from National, but leaves open the question of whether the existing 650-mile perimeter with 7 grandfathered cities beyond the perimeter will be retained or a new 1,000-mile perimeter will be instituted. As part of an effort to discourage the preeminence of National Airport, I urge the retention of the 650-mile limit and elimination of the grandfathered city exemptions. Because of the downtown location of National, with the associated safety and noise problems, it should be used primarily to serve nearby cities and not those at great distances from Washington. The cities outside the 650-mile perimeter would not be denied access to Washington just as they are not at present. On the contrary, passengers from those places would be welcomed and well-served at the newer, more modern facilities at Dulles. And they would win the thanks of at least a million Washington residents adversely affected by National.

NOISE RELIEF

Besides serving the interests of the airlines and the flying public, a larger relative role for the other airports would reduce the adverse environmental conditions inflicted on the neighbors of National Airport and the citizens living beneath its flight paths. The EIS points to some noise relief from the proposed policy, largely from the earlier and stricter curfew. Other relief would result from the introduction of the less noisy wide-bodied aircraft, but only if the use of other noisier planes is cut back. Two further provisions would have to be met: that the wide-bodied planes can fly safely into and out of National, and that National's facilities have the capacity to handle them. The proof of their safe operation at National is vital, but the necessary tests under all conditions have not been run. The policy should go a step further to gain the maximum benefit from the use of wide-bodied aircraft. Each new wide-bodied operation should be matched by a reduction of two operations by older, noisier types of aircraft. This tradeoff would increase the noise relief at National. Passengers and operations growth would both then occur where they belong—at Dulles.

COMMUNITY COMMUNICATION AND OWNERSHIP

Because the airport management at National and Dulles is part of the Federal government, it can and does act independently of the local governments. Some cooperation has developed between the FAA and the Metropolitan Washington Council of Governments (COG) with regard to planning changes in aircraft paths and tests. But more is needed. I have proposed a more formal mechanism for citizens, business, air industry, FAA, and local government officials in the Washington area to meet and discuss policies for the daily and long-range operation of the airports. This Airport Advisory Group would be set up under the aegis of COG. Even this would not adequately address the need to make the airport management more responsive to local concerns. As long as ownership stays in Federal hands responsiveness will be a problem.

Serious consideration should also be given to having the FAA divest itself of ownership of National and Dulles Airports. I recommend that the Governor of Virginia, through the Department of Aviation, in conjunction with the local governments of Northern Virginia, initiate a study on this matter and issue a report as soon as possible.

The FAA's principal mandates are to foster aviation safety and promote civil aviation. While promoting the air industry in general, it has not thought that it could or should promote the two airports that it owns. Because it must deal with the air industry nationally, it has what could be considered a conflict of interest in

dealing with the airlines and others in specific instances arising from its role as airport operator. This dual role has been the source of much frustration for the communities in the Washington metropolitan area. Many business people and local governments in Northern Virginia are disappointed by the lack of promotion of Dulles Airport and of economic growth in the immediately adjacent area. Others in the metro region think that the FAA has not been willing to take the necessary steps to relieve the noise problems at National Airport or to shift traffic to Dulles. The modest steps in the policy proposal should be implemented, but they are too little too late, and do not reassure the community that the FAA is responsive to its concerns. Different ownership of the airports, be it by a Northern Virginia regional body, by the state, or by some other entity, could go a long way toward restoring the confidence of the citizens of the region that their interests are being given full weight. Furthermore, new ownership should lead to vigorous promotion of Dulles and a diversion of flights away from National where safety and noise are a serious problem to Dulles where the facilities are better designed to handle large numbers of jet aircraft.

To summarize, a policy for the Metropolitan Washington Airports must relieve the adverse effects of National, greatly enhance the role of Dulles, and provide for communication with the community. The proposed policy and other steps in process are signs of a shift in the right direction, but they should go much further, much faster. The airports in the Washington region should share the air traffic more equally. This could be assisted by more slot reductions at National than have been proposed and a cap on its passenger growth at a level below the proposed 18 million a year. The result would be a greatly enhanced role for Dulles, beyond what the proposed policy would lead to. The proposed advisory group, within COG, should go forward and begin working as soon as possible. The possibility of changing from Federal to some more locally-oriented ownership should be seriously investigated immediately. No less than the FAA's proposed policy should be carried out, and more is needed.

Mr. ANDERSON. Please proceed.

Mr. FISHER. Thank you, Mr. Chairman.

I do appreciate this opportunity to appear before you.

As the Representative of the congressional district in which both Dulles and National are located, I am pleased to have a chance to share my thoughts on the issues that you are going to be dealing with.

You will find that my views coincide very closely with those just expressed by Senator Warner.

The FAA policy is needed in order for the airport operators to plan properly for the future use, development and improvement of air facilities in the Washington area. Now, many standards could be used for judging the appropriateness of the proposal.

I would suggest three criteria, mainly three criteria, for judging the proposals.

First, steps should be taken to increase the relative use and importance of Dulles Airport as compared to National.

Second, and closely related, the noise and other adverse environmental and health impacts of National Airport should be significantly reduced.

Third, the Washington community must be involved in consultations about airport activities and possibly about ownership. Other standards could be suggested but I think those summarize it quite well.

Enhancing the role of Dulles relative to National, I believe, should be a central and vital element in any policy for the Metropolitan Washington FAA Airports.

The basis for this is contained in the proposed policy. The trouble is, it does not go far enough or it doesn't go fast enough.

The environmental impact statement that you are all familiar with contains a good deal of evidence that Dulles Airport should

play an even greater role in the future than the proposed policy would allow.

There is lots of land out there for buffering for safety and noise abatement purposes. At peak times certainly and generally all the time Dulles has considerable passenger and freight capacity that National doesn't offer.

In contrast, National is located in a built-up area with no opportunity for acquisition of vitally needed buffer zones.

Already its facilities are outdated, overcrowded, and increasingly dangerous. This is the kind of evidence that shows that passengers and the community both would be better served if more of the growth, more of the increase could be channeled to Dulles.

The Dulles area is a logical and suitable area for additional trade, light industrial development, research and development firms, and free trade zones, this kind of development.

It is a logical location. It is needed. It is wanted there. Many passengers, of course, like the proximity of National Airport, including our colleagues, but they would soon come to appreciate the better facilities at Dulles.

I would like to add that with the completion of I-66 coming right into the heart of downtown and with the connector link between the present Dulles access road and the I-66, which is clearly in the cards, it will soon be possible to come from Dulles right to the White House and Capitol Hill very speedily with little inconvenience.

Parenthetically, Congresswoman Bouquard, I believe Chattanooga is within the 650-mile perimeter, and so is Atlanta, and the trouble is the airlines don't see enough nonstop business from Chattanooga to justify the flights, and under the deregulation of the air industry they have much greater choice in the lines that they will operate nonstop.

Second, the noise relief. National, of course, was located 40 years ago, as Senator Warner said, when aircraft were much smaller, when flights were far fewer and populations less. There was no development in Rosslyn or in Crystal City at that time.

They were level, flat, almost nothing was there. Now we find that National Airport is right in the heart of downtown Arlington.

It is surrounded by as many as 1 million people who hear the noise minute after minute during the rush hour, and this has to be taken into account, it seems to me.

Furthermore, in spite of all that is said, I think there is a severe problem of safety, and I would hate to see us have to wait for a bad accident at National before we do something to channel the increase in flights out to Dulles.

Finally, the third criterion I suggested, the community aspect of it: Because the airport management at National and Dulles is part of the Federal Government, it can and does act independently of local governments, and those of us like Congressman Harris and others, Congresswoman Spellman, who have been in local government before coming to Congress, know very well that the local people don't get too much attention at critical points from the Federal agency.

Some cooperation has developed between the FAA and the Metropolitan Washington Council of Governments with regard to plan-

ning changes in aircraft landing pathways and other matters, but much more is needed.

I have proposed and am working quite vigorously toward the creation of an advisory committee to FAA on the operation of the airports around here.

We are trying to move this under the aegis of the Council of Governments which has a pattern of advisory committees. I think that can help a great deal with membership drawn from local government, from interested organizations, from citizens, and I strongly urge that this part of your thinking, as a way of reducing tension between the million or so people around here who really hate that noise incessantly day after day.

Finally, I think serious consideration should also be given to having the FAA divest itself of ownership of National and Dulles Airports.

I am recommending that the Governor of Virginia through the department of aviation of the State and in conjunction with local governments in northern Virginia, initiate promptly a study on this matter and issue a report of its findings as soon as possible.

The FAA's principal mandates are to foster aviation safety and promote civil aviation. While promoting the air industry in general all over the country, it has not thought that it could or should promote the two airports that it owns, because that might bring them into competition with airports owned by States and municipalities and port authorities, and so forth elsewhere in the country.

This dual role has been the source of much frustration for the communities in this metropolitan area. Many business people and local governments around here are disappointed by the lack of promotion of Dulles Airport and the lack of economic growth in the immediately adjacent area where it is altogether appropriate for such growth to occur.

Others in this region think that the FAA is not willing to take the necessary steps to relieve the noise or safety problem at National Airport or to shift traffic to Dulles.

The modest steps in the policy proposal you are considering should be implemented but they are too little and they are too late.

They do not reassure the community that the FAA is responsive to its concerns. Different ownership of the airports, be it by the northern Virginia regional body or the State or some other appropriate entity, could go a long way toward restoring the confidence that citizens of the region, that their interests are being given full weight.

Furthermore, ownership under a new arrangement, such as I have proposed, could lead to vigorous promotion of Dulles and a diversion of flights away from National where safety and noise are so serious.

Those are the thoughts on my mind, Mr. Chairman.

I hope that your committee, as it goes into this, will take them very seriously into account.

Thank you very much.

Mr. ANDERSON. Thank you, Joe, for a fine statement.

Our next witness is the Honorable Michael Barnes from Maryland.

Mr. BARNES. Thank you very much, Mr. Chairman.

I also very much appreciate the opportunity to testify on the Department of Transportation's proposed policy for the Washington area's airports.

This is obviously a matter of urgent concern to thousands of my constituents in Maryland's Eighth Congressional District whose communities are directly and adversely affected by airport noise.

This committee is no stranger to the issue of noise impact of the airports on local communities, and I would like to take this opportunity to thank the members of this committee who helped in the effort earlier in this Congress to establish fair aircraft noise standards.

National Airport is at a crossroads today, and it would be an understatement to say that there are important questions about its future which need to be addressed.

Are we going to continue on a path of squeezing more and more passenger traffic into a facility which is already strained beyond its capacity?

Will we be able to successfully take advantage of unused capacity at nearby Dulles and BWI airports, yet still meet the transportation needs of the local population, not to mention Congress and the Federal agencies?

Will the Federal Government hear the pleas of area residents who have responsibly petitioned the Government for relief from the unending blight of aircraft noise on their communities?

In an interview with the Washington Post late last year, the Secretary of Transportation, Hon. Neil Goldschmidt, referred to National Airport as a dump and a disgrace, and of the matter of aircraft noise, said:

How is it that we are supposed to say to the people in other places in the United States that this Government has a policy of protecting them from damage to their hearing and the quiet enjoyment of their homes and property, while still maintaining the public's interest in travel, if we can't do it in the airports we own?

So there are indeed a number of challenges, tough challenges, before us today with respect to the future of National Airport.

Certainly there are varying interests and, some might contend, competing interests at stake here. But I believe that, with creative planning and intelligent use of our existing airport resources, a policy can be attained that balances the needs of airline passengers, local residents, and the airlines themselves.

If this city were served by National Airport alone, the questions before this committee today would be far more difficult. The need for planned growth in air transportation would stand in direct contrast with the aspirations of local citizens for relief from aircraft noise, and a mutually satisfactory conclusion would be close to an impossibility.

Fortunately, that is not the case. We are extremely lucky in that we have two other airports in the Washington area, Dulles and Baltimore-Washington International, and any plan for future air travel into Washington ought to recognize the opportunities that these facilities offer for absorbing new growth in air transportation.

With respect to the specifics of the DOT proposed policy for Washington metropolitan airports, I support the concept of reducing the growth of passenger traffic at National Airport, and I

would argue, as Congressman Fisher has, that we go even further and actually cut back from the current levels of traffic there.

Dulles and BWI are presently very underutilized and I believe we should do everything possible to encourage an increase in the use of these airports. Clearly, the highest priority should be given to the effort to improve access to these airports, and the BWI Amtrak Station, soon to be operational, is an example of what can be done in this regard.

You can go right over here, get a train and go straight to the airport. It will be very convenient.

I support the proposal to establish a curfew on airport operations at National, and in fact I would much rather prefer a 10 p.m. absolute curfew. Under the proposed plan to set 9:30 as the latest scheduling time and allowing flights up to 10:30, I fear that airlines may cluster their final flights just before 9:30 and thus allow operations at the airport to extend to 10:30 on a regular basis.

If it is determined that National is properly equipped, I support the proposal to allow wide-body aircraft into the airport and hope that their use will result in fewer flights and a saving of energy.

I agree with the proposal that National Airport should remain a "medium" and "short-haul" status airport. Therefore, of the two alternatives mentioned in the proposed policy, I support the existing 650-mile limit with seven "grandfather" exemptions.

Finally, obviously, all proposals should be carefully weighed with safety aspects as the primary consideration.

As Congressman Fisher said, it would be tragic if we waited for an accident to occur due to the dangers that exist at an airport that is essentially in the middle of a city.

Mr. Chairman, I would like to call the committee's attention to the testimony today of the Metropolitan Washington Coalition on Airport Problems, represented by Eric Bernthal.

This coalition represents over 100 citizen organizations throughout the Washington, D.C. area, including many individuals from the Eighth Congressional District of Maryland, and they have studied the proposed DOT policy and related issues very carefully.

This group has been most helpful in providing me information about the impact of aircraft noise on local communities, and they have served as a reliable and effective voice for citizens who are working through the political process for aircraft noise abatement.

Thank you very much for the chance to appear on this subject today.

Mr. ANDERSON. Thank you, Mike, for a very fine statement.

Our next witness is Herb Harris from Virginia.

Mr. Harris, the full text of your prepared statement will appear in the record at this point.

[Statement referred to follows:]

STATEMENT OF HON. HERBERT E. HARRIS II

I am pleased to have the opportunity to share with the subcommittee my thoughts on the proposed operating policy for Washington National Airport.

I have been dealing with the problems of National Airport for nearly twenty years now—as a citizens association president in the Mount Vernon area, during service on the Fairfax County Board of Supervisors, and as a Member of the House of Representatives.

Throughout my public career, I have encountered no institution or facility that has had such an adverse impact on the quality of life in Northern Virginia. Nation-

al Airport is a persistent and pervasive threat to the public health and safety. Something must be done.

Although some may not want to face up to it, the quality of life in Northern Virginia has been sacrificed on the altar of private convenience. Public health and tranquil neighborhoods have been the victims of unplanned, unrestrained, and unrealistic growth at National Airport.

I was impressed with the Draft Environmental Impact statement published by the F.A.A. because in it, I saw significant progress. The proposals indicated that the F.A.A. had recognized the essential elements of a comprehensive program which would relieve the noise burden in the area. But, those elements must be implemented on a stricter schedule, and on a stricter basis, than proposed in the policy.

I want to make it clear to members of the Subcommittee and to the F.A.A. that my constituents are not only affected by the noise of National, but they are among National's most frequent customers as well. Any reduction in service, any cut back in flights or limitation on hours will require as great a sacrifice from Northern Virginians as from any other part of the country. But these reductions are necessary.

Specifically, the proposed reduction in hourly slots, and the reallocation of those slots as proposed in alternative B would both reduce the noise burden on area residents, and restore air service to many communities that have lost scheduled air carrier service.

Additional sections of scheduled flights, however, must be counted as additional flights. The second section of the New York-Washington shuttle is no less noisy than the first section. Each takeoff should be counted towards the hourly limit.

The introduction of wide-body aircraft—should wide-body operations prove safe—will permit a further reduction in hourly flights on a two-for-one basis. The introduction of wide-body aircraft should not be permitted without such a reduction.

In my written comments to the F.A.A., I recommend that the cap on passenger load growth should be imposed immediately, rather than permitting continued expansion until the annual passenger load reaches 18 million. National airport is over-crowded today, resulting in delay, congestion and inconvenience for air travelers as well as airport area residents. Additional growth beyond current levels should not be permitted, and if possible, a rollback in passenger load to approximately 14 million should be required.

In this regard, facility improvement, including modification of terminal buildings, approach roadways, passenger pick-up and drop-off areas, and the Metrorail station, should be designed to relieve congestion—not to permit additional growth.

We are already operating under extremely congested conditions at National. Those conditions can be improved, but not by offsetting facility improvements with additional passenger growth.

One aspect of the proposed policy which has received enthusiastic support from airport area residents is the modified curfew which would eliminate the bunching of flights at the end of the day's operations which currently forces operations to continue well beyond the last scheduled take-off or landing. I strongly support the proposed modification of the hours of operation.

Finally, I recommend retaining the current 650 mile perimeter rule without any expansion. Since flights to more distant cities make more noise during take-off because of added fuel weight, there should be no extension of the perimeter.

I want to express to you the urgency I feel about implementing this policy. It is a question of public health and community protection for my constituents.

There is real hope for improvement in this policy. On page III-13 of the DEIS, the F.A.A. states:

"The area comprised of the NEF (Noise Exposure Forecast) 30 and NEF 40 would be reduced approximately 50 percent from the existing 26 square miles to approximately 13 square miles in the future. The NEF 40 alone would decrease from 4.4 square miles to about 2 square miles, or a 54 percent reduction.

"Most of the land 'falling out' of the NEF 30 in the future is comprised of park lands and residential areas . . . it can be seen clearly that the length of time above threshold levels would also be reduced."

That, Mr. Chairman, is what it is all about—reducing the impact of jet noise on residential and recreational communities.

I hope the subcommittee will support the proposed policy, with modifications to make it stricter. Airport noise is a threat to public health. With the phase-in of noise reduction standards required by FAR part 36, some relief will be forthcoming. But much more is needed. The continued tradeoff of the quality of life in the Metropolitan area for the minimal convenience of air travelers is unjustified.

And I want to reemphasize that any reduction in service will involve a sacrifice on the part of my constituents as great as, or greater than the sacrifices of other

parts of the country seeking to increase service. We not only live near National, we use National. Everyone will have to give up a little something for the greater good.

Mr. ANDERSON. Please proceed.

Mr. HARRIS. Thank you very much.

Let me not add to the noise pollution. I came over here to try to cut it down.

Mr. ANDERSON. We will make your remarks a matter of the record.

Mr. HARRIS. Let me say one of my proposals in the past is to require all planes to take off to the north, because my jurisdiction is to the south of the airport.

Joe handles the north problem so well that I thought maybe if we just had them all take off to the north we would solve it, but I don't think that is a practical suggestion.

I think perhaps we have got to become realistic and quit putting off the time that we come to grips with an extremely serious situation.

Many of my colleagues live out in my district. I want to welcome them as neighbors and ask them to stay out in their back yards long enough to hear these planes come over every 3½ minutes, and realize the tremendous disruption to the quality of life in northern Virginia National Airport is causing because of the way it is operated.

I don't think we can sacrifice the quality of life of northern Virginia on an altar of private convenience here. I don't think it is just or consistent with our current environmental considerations. I think something must be done.

I am encouraged by the draft environmental impact statement which the FAA has published. I hope that we cannot only retain the current curfew requirements, I think we have got to enforce them more vigorously. We can't schedule a bunch of flights at the end of the curfew and not expect them to exceed the curfew on a fairly regular basis because of backup.

We have got to limit the number of flights that can be scheduled toward the end of that curfew hour. We have got to make sure we can bring the wide-bodied jets in safely and have to make sure that this is used as a method of cutting down the number of flights, not as a method of putting more passengers, more traffic and crowds into National Airport which is already very overcrowded.

I have talked about this over 20 years as a public life, as a citizen's association president, as a board of supervisors member, and as a Member of the House of Representatives.

I see the problem growing, and it is absolutely necessary that we put legitimate restrictions on National for the health and the welfare of the people that comprise a core of our Nation's Capital, and I urge this committee to do everything it can to move expeditiously to make sure such restrictions are not only kept in place but improved, and for heavens sake, not to give into the pressures of expanding the number of flights because of some special local interests of one State or the other.

Thank you very much for your help, Mr. Chairman.

Mr. ANDERSON. Thank you, Herb.

I have statements from Congresswoman Spellman, Congressman Bob McClory, and Senator Mathias which will be made a part of the record at this point.

[Statements referred to follow:]

STATEMENT OF HON. GLADYS NOON SPELLMAN, A REPRESENTATIVE IN CONGRESS
FROM THE STATE OF MARYLAND

Mr. Chairman, members of the Aviation Subcommittee, thank you for the opportunity to appear before you today to testify on the Federal Aviation Administration's proposed policy for the Metropolitan Washington Airports. I am deeply appreciative of the Subcommittee's efforts in grappling with the chronic problem of airplane noise during the 95th and 96th Congresses. Since my constituents are among the seven million people who suffer from the effects of aircraft noise, I'm encouraged by the Subcommittee's continuing concern and interest in this issue.

Coming four months after enactment of the Aviation Safety and Noise Abatement Act, this hearing is especially timely. It occurs at a time when many of my friends in local government perceive an abandonment of the Federal government's commitment to deal seriously with the problem of aircraft noise, based on this statutory easing of the 1976 Fleet Noise Rule requirements. Since the Conference Report to Public Law 96-193 states that "this legislation is intended to be the final resolution of this (aircraft noise) issue," it is important for the FAA to develop and implement a comprehensive long-term policy to mitigate the impact of noise on the residents of the Washington metropolitan area by carefully managing the growth of its three major airports.

In this regard, I am fully supportive of the FAA goal of "a more balanced utilization among the regional air carrier airports." Unfortunately, the new National Airport Policy does not live up to this goal. I am disappointed that the specific provisions are aimed at establishing a permanent air passenger limit of 18 million people. I would remind the Members of the Subcommittee that the Metropolitan Washington Council of Governments (COG) recommended a 16 million passenger cap in its 1975 study, "The Future of Washington's Airports" and its 1978 "Supplementary Report." This lower figure has been strongly supported by all local governments and affected agencies. In addition, the COG board revised its position last month and recommended an air passenger traffic limit of 14 million by 1985. The projected impact of the FAA proposals is in "reducing" from 20 to 18 million the number of passengers using National in 1985 actually represents a significant increase over the widely accepted COG goal, or its most recent suggestion, and I would urge you to consider the 18 million cap in this context.

My chief criticism relates to the FAA's failure to recommend steps which could more dramatically reduce aircraft noise in the Washington area without imposing an appreciable hardship on air travelers or the cities which provide, or could provide, service to National.

First, I am seriously concerned that the FAA has failed to grasp the strong trend toward increased residential development in the suburban areas, the actual decline in the District of Columbia's population and the increased siting of businesses in the suburbs. As these dominant demographic trends continue, Baltimore-Washington and Dulles International airports will become increasingly convenient to area travelers during the 1980's and 1990's. Although not specifically within the scope of the FAA's proposed rule, BWI must, of course, be considered in developing a regional air passenger plan. The FAA is missing an opportunity to channel the increasing air passenger load to these modern, efficient facilities. By reinforcing existing patterns of airport use, the plan would unnecessarily inflict further airplane noise on the most densely populated sections of the area.

Permitting this increase in the passenger load at National would require a major upgrading of its facilities, adding to the intolerable congestion that exists today. The new construction combined with rising passenger loads could further exacerbate the access, traffic circulation and parking problems that plague users at National. The State of Maryland recently completed a major capital program, including a \$70 million passenger terminal. Although BWI handled less than 4 million passengers in the fiscal year ending September 1979, its current capacity is 11 million passengers. Dulles could also be used to accommodate increasing regional traffic. I cannot see the logic in expending additional tax dollars to upgrade National when BWI and Dulles are operating far below capacity.

I am generally supportive of the other major provisions of the proposed new National Airport policy, and would like to briefly comment on them at this time.

The reduction in operating hours for commercial air carriers, commuter airlines and general aviation, and the closing of the airport to all but emergency traffic

after 10:30 p.m. are long overdue. The practice of bunching arrivals and departures at 10 p.m. is a particularly annoying problem for those who live in National's approach and take-off corridors, coming at a time when any additional noise is unwelcomed. I would recommend a further ban on airport use from Saturday, noon, to Sunday, noon, to permit residents the opportunity to enjoy part of the weekend without the persistent drone of landing and departing planes.

I am also in agreement with the proposal to reduce slots for the major airlines to 36 per hour, with the shift in emphasis to commuter air carriers. There are almost twice as many operators waiting for commuter slots than presently serve National. Consistent with National's role as a short- and medium-haul airport, the FAA should substitute commuter for commercial air carriers to the maximum extent practicable.

Any weakening of the perimeter rule, which limits with certain specific exceptions nonstop service to cities within 650 miles, could significantly undermine National's short- and medium-haul character. Any expansion in the exceptions could hurt local and commuter service by increasing the demand for commercial slots and could lead to the expansion of National as a long-haul terminus. The suggestion that the current practice is discriminatory to those non-grandfathered cities between 650 miles and 1000 miles from Washington, turns the concepts of "grandfathering" on its head. The 1966 agreement with the air carriers represented a reasonable attempt to establish sound airport use policy without exacting a severe economic cost on the affected carriers. I'm sure the parties to that agreement never imagined that it would be used to support the view that all airports within 1000 miles should be permitted nonstop access to National. The only appropriate review of that 1966 accord should be to determine whether the growing impact of jet noise on the region and the availability of alternate airports requires the elimination of the special exemption. Given the options set forth in the Federal Register notice, I would urge the retention of the present perimeter rule.

Jet aviation noise is one of the most serious constraints on the future development of aviation in the country. It is the cause of stress, aggravation and emotional disorders among our constituents. It has lessened property values by over \$3.2 billion and cost \$25 million in legal judgments. It has caused airport operators to spend over \$200 million for extensive land-purchasing programs. These direct costs as well as the indirect costs through the erosion of the local tax base are, in a word, substantial.

It is in this context that I would like to raise the issues of the perceived convenience of National and the over-all impact of the proposed FAA policy. One of our Colleagues in a letter to Secretary Goldschmidt suggested that the FAA proposal "appears to fly in the face of the intent of Congress in passing the Deregulation Act of 1978." I emphatically reject the idea that deregulation signaled the abandonment of the Federal effort to reduce jet noise. This assertion also ignores the very real burdens that turbojet passenger travel brings to our communities, burdens that must be considered in shaping the future of air service growth in the Washington metropolitan area and in the nation. The severity of the noise problems in the Washington area has encouraged COG and the FAA to conduct a demonstration test last summer, led to the creation of a number of community anti-noise associations and recently prompted a local Prince George's County official to propose scattering jet flights from National to distribute the noise throughout the metropolitan area.

Presently, adequate service to downtown Washington exists from Dulles, and door-to-door limousine service is available between BWI and a large segment of the Maryland suburbs and the District of Columbia. The plan's Draft Environmental Impact Statement fails to take these services adequately into account. The DEIS also ignores the scheduled opening of the BWI Amtrak Station in the fall of this year. This air-rail passenger facility will provide direct commuter rail service between the Airport and Washington with connections at Union Station and New Carrollton.

It has been suggested that this FAA proposal, by limiting the growth of air passenger service at National, could deny important access to the downtown Washington market area from industries in medium-sized cities. I cannot make sense of this claim.

Visitors and residents of the Washington metropolitan area enjoy the use of three airports, and as I have attempted to point out, BWI and Dulles have substantial excess capacity which could be easily used to meet the increasing demand for service to this area. I'm not sure what sorts of businesses would be harmed by an additional half hour trip into downtown Washington, but I would urge the FAA and this Subcommittee to examine such claims critically. I do know that aircraft noise

has been and will continue to be severe health and environmental hazard in the Washington area until a responsive regional airports policy is adopted.

CONGRESS OF THE UNITED STATES,
HOUSE OF REPRESENTATIVES,
Washington, D.C., June 10, 1980.

HON. GLENN M. ANDERSON,
Chairman, Subcommittee on Aviation of the Public Works and Transportation Committee, Washington, D.C.

DEAR MR. CHAIRMAN: It is my understanding that your subcommittee is receiving testimony on the subject of reducing air service at Washington National Airport.

As one who employs the facilities at Washington National Airport frequently—particularly in traveling between Washington and my congressional district in Illinois—I find the National Airport facilities extremely convenient and useful.

While the airport terminal traffic for ground transportation seems at various times congested, it has been my observation that the air traffic at this facility is not excessive and provides a maximum convenience to the Members of the Congress and others who must do business in Washington, D.C.

I would regard the transfer of many plane schedules to Dulles Airport as inconsistent with efforts to conserve motor fuel and it would seem to impose other financial burdens which should be avoided. I am confident that your subcommittee will want to have in mind the convenience of the air travelers who are served by the flights in and out of Washington National Airport and will likewise have in mind the energy conservation aspects which are related to this proposed removal of service from Washington National to Dulles Airport.

I would be pleased to supplement these personal observations by responding to any inquiries that members of the committee may wish to propound to me.

Sincerely yours,

ROBERT MCCLORY,
Member of Congress.

STATEMENT OF SENATOR CHARLES MCC. MATHIAS, JR.

I thank the Subcommittee for the opportunity to reaffirm my position on the proposed FAA policy relating to the operation of Washington National and Dulles International Airports and the impact of those operations on the region's other major airport, Baltimore-Washington International.

The proposed limitations for National announced by Secretary Goldschmidt in December of 1979 were welcome news to me and residents of the Washington region who must live with the daily overhead thundering of those behemoths in the sky. The proposed decision by the DOT Secretary—and I emphasize it is still a tentative one—would culminate the efforts of citizens, Washington area members of Congress, and those concerned about air traffic safety to bring about a rational policy for the only two airports in this nation owned and operated by the Federal Aviation Administration.

The airlines seem to be resorting increasingly to a shuttling system between cities in an effort to keep their planes full. But for the air traveller—be he flying for business or pleasure—those schedules can often mean inconvenience and loss of time.

The direct, non-stop flights are for the most part scheduled out of Dulles and Baltimore-Washington for major cities. In December of 1979, I wrote Secretary Goldschmidt suggesting that the FAA conduct an origin and destination survey at National Airport. We would then have the facts on the real needs of air travellers coming into National. And it is my belief that a significant portion of that passenger volume originates outside the downtown core of Washington and is destined for points beyond the present 650 mile perimeter limit. Likewise we may find that a significant number of arriving passengers originate from points outside the 650 mile perimeter or have destinations in the Washington region equally convenient to Dulles or BWI.

To date, however, the DOT has not taken me up on my suggestion of such a survey.

The regional air passenger traffic is obviously imbalanced among the three airports. National, 39 years old, dates from the pre-jet age. An average day at Washington National involves 600 aircraft operations—60 operations per hour, or one flight per minute. The proposed policy would reduce the certificated commercial operations per hour from 40 to 36. This is a step in the right direction. On the other

hand, the proposed passenger ceiling is unrealistic. The passenger volume today at National is thirteen million. This is far beyond the existing capacity at National. The proposed policy would further exacerbate this situation and would allow that passenger volume to grow to an unreasonable 18 million passengers per year. This implies a major expansion of Washington National using taxpayer dollars.

BWI, on the other hand, has an 11 million passenger capacity. Yet, it is operating at 36 percent of capacity, handling four million passengers in 1979.

Of the total passengers carried by the three airports in the region, National carries 68 percent; BWI carries 17 percent; and Dulles carries 15 percent. Clearly, Dulles and BWI are grossly under-used. Despite this, Dulles is undergoing expansion at taxpayers' expense further increasing its already under-used total capacity. This is mismanagement of federal tax dollars and a waste of a perfectly situated airport.

Baltimore-Washington International Airport, centrally and conveniently located, as its name suggests, in the Baltimore-Washington corridor, is capable of serving the air traveller market to a much greater extent than at present. It is ideally located away from dense population centers, but conveniently accessible by bus and limousine service via the Baltimore-Washington Parkway. In addition, it will be served by a Northeast Corridor rail station in the next few years. I am proud to have played a role in assuring that BWI will be served by high speed rail from both Washington and Baltimore.

So it seems clear to me that the FAA has the solution at hand to its problem at National Airport. BWI and Dulles can easily accommodate the overflow of flights to National. Once that occurs, I am confident that more and better ground transportation will quickly appear to serve those airports. I, for one, will continue to support convenient access to both regional airports.

Once National has been freed up from some of those longer-haul flights, it could resume its role serving short-haul cities and towns with both the major commercial and the commuter airlines. This is a role it is designed for and which would not place the kind of strain on ground facilities and transportation which now exists.

Lastly, I would point out to several of my colleagues in the House, that the Washington Airports Policy in no way will reduce the service from medium size cities to Washington. It may change which airport is served by the scheduled commercial airlines, but decisions about service and schedules are determined by the carriers, not by the airport operator.

Mr. HARRIS. Mrs. Spellman and I were just managing two bills over in the Civil Service and Post Office Committee of great importance to her district, and she had been called on a very short notice basis to the Steering and Policy Committee.

She asked me to indicate for her her intense interest in the subject and joins with me in the comments that I made, and she promises to work with this committee in any way she can.

Mr. ANDERSON. I have some questions for the panel here, and then we will get to the other members.

Some of the written statements from members of the panel favor retention of the rule prohibiting nonstop service from National to cities more than 650 miles away.

Do the members of the panel believe that a perimeter rule helps control noise at National and, if not, what justification is there for Government intervention to prevent the air carriers from providing the service which they and their customers want at National?

Mr. HARRIS. I will take the first shot at it and then give it to my colleagues.

There is no question that the perimeter rule is absolutely imperative if we are going to try to control noise, number one, not just because of the number of flights, but because of the noise element itself. The longer-range planes with their extra load of gas make a greater noise because of the greater need of thrust when they are taking off from National, and it imposes a severe impact, as far as noise pollution is concerned.

Mr. FISHER. The restriction of perimeters is central to the whole thing. There could be some flexibility but as soon as it is opened up

and you reach out very far beyond that, then there are always 10 other places with an equal claim.

Senator WARNER. I indicated a willingness to look at the mixed study but favor the perimeter rule.

Mr. BARNES. I commented on that in my testimony.

Mr. ANDERSON. My next question is: Do the members of the panel believe that the FAA should continue to have the responsibility for managing Dulles and National and, if not, what alternate arrangements would you recommend?

Senator WARNER. At this present time if the hearing could contain itself to those very vital questions we are raising this morning, this could be a subsequent issue.

I would want first to have the study proposed by my colleague, Mr. Fisher, to look precisely at the economic impacts on Virginia and particularly the taxpayer liability of Virginians, should this shift take place.

Mr. HARRIS. I would make the point very bluntly. I was chairman of the study and for the region established under the Northern Virginia Transportation Commission and the Washington Metropolitan Transit Authority. I think there is no question that local control of National and Dulles is much to be preferred to the current anomaly of trying to have a regulator operate the airports at the same time.

It just doesn't make sense, and I believe very strongly in community control of those airports. The Federal Government could be a partner to it, but we should establish some sort of a regional operation to conduct these airports.

Mr. ANDERSON. Do your contacts with constituents indicate that air carrier operations at National after 10 p.m. are a source of great annoyance and, if so, is the problem dealt with adequately by FAA's proposal to allow 18 air carrier flights between 9 and 9:30 with no flights scheduled after 9:30?

Senator WARNER. This is critical, and I concur in the Chair's observation that this would be a great step forward.

Mr. BARNES. There is no question that this is a matter of major annoyance. It goes beyond annoyance. There have been studies which have been done for which I can provide references later to the members of the committee about the health hazards of continued operations of very noisy aircraft over residential areas, such as those in the districts represented by those of us who are here today.

It is not simply a matter of annoyance. It is a serious issue that is of very major concern to our constituents and it should be of serious concern to all of us.

Mr. FISHER. This, if I could add, is quite essential with the best of regulations on curfew. We do know, those of us who live around here, that quite a number of planes somehow straggle in well after the hour they are supposed to be there; and when safety is at stake, nobody objects, but it happens very, very frequently, and you can imagine the number of phone calls we get day after day after day from irate citizens who say, "What is all of this about the curfew?"

They will jot the time that the plane came over.

Mr. ANDERSON. How many flights are scheduled at 9:59?

Mr. HARRIS. Can I offer for the record, Mr. Chairman, the schedule that you are requesting?

Between 9 and 9:59 there are 36 flights scheduled.

Between 9:59 and 10 p.m., the last minute of the curfew, there are 18 flights scheduled.

Mr. Chairman, the smile is appropriate, I think. Anyone who thinks that you can get, even with the marvelous controllers that we have over at National, we can get 18 flights off in 1 minute, is trying to kid somebody.

As a matter of fact, 36 plus 18 gives you a total of 54 flights that are scheduled to take off in the last hour of operation before the curfew.

It doesn't happen, and they know it doesn't happen, and let me say, as Joe indicated, our constituents know it does not happen.

Mr. FISHER. Could I add this, as Congressman Harris indicated, a lot of members live in our district and without wishing to name anybody, there are a number of members who, they or their families, are regular phoners into my office on this problem.

Mr. HARRIS. They call me at home around 11 or 12 o'clock at night, Mr. Chairman.

Mr. ANDERSON. Are you aware of any problems created by the present policy of allowing general aviation aircraft which are not jets to operate throughout the night at National?

Senator WARNER. Of course, you have the cost problem, Mr. Chairman.

I frequently come in from distant points throughout the State late at night so it would be a handicap to me to lose that service, but I notice that a substantial part of the airport and overhead costs must be maintained to accommodate a very few aircraft.

I think we ought to have a rigid curfew, cut it off, that is it. Mr. FISHER. Unfortunately, Mr. Chairman, there is no way of requiring that the general aviation planes whisper while the others shout. They too make noise, and in the still of the wee hours of the night, a little bit of noise really comes through that bedroom window in full force.

Mr. ANDERSON. Do members of the panel believe that the benefits of service to National Airport are outweighed by the costs of noise pollution and declining land values and the loss of tax revenues, or do you believe that the airport is a positive economic factor, despite the costs that can be attributed to it?

Senator WARNER. Mr. Chairman, there is no quick answer to that question. It is the responsibility of the Congress and, as you know, I am on the committee on the other side, the Commerce Committee, that will look at this.

I would not want to answer that in a quick way, but I must leave now, but I hope I leave the clear impression that I am going to fight and fight hard for the constituents of Virginia, not just in a parochial sense, but this is their principal airport, not only northern Virginia but it serves the remote areas of Virginia and this must be recognized by the Congress.

I think my colleagues and I are going to fight hard for our people to see that a fair and equitable balance on all of those issues is struck.

Thank you, Mr. Chairman and members of the committee.

Mr. SNYDER. Would the chairman yield before the Senator leaves, about that observation?

I have a little bit of a problem with it, and I wouldn't want to make an observation after you leave.

I understand what you are saying. As a matter of fact, you ad libbed after your prepared text that, this was located in Virginia, and it is Virginia's main airport.

I say I understand it, because the Greater Cincinnati Airport is in Kentucky in the congressional district that I am privileged to represent, and have been for some 16 years, and I have the same feeling that this is Kentucky's airport.

But I also understand that that would not be Kentucky's main airport but for the fact that Cincinnati, which is in Ohio, is over there across the river, and if they wanted to have a Cincinnati Airport of the metropolitan area, it would be much further away from the Cincinnati area than the one that is in Kentucky because of the terrain, the situation, and the population, so I understand what you are saying.

But I do think it is perhaps not a congressional airport but this is the Nation's Capitol, and the fact that that airport is Virginia's main airport is somewhat conditioned upon the fact that the Nation's Capitol is across the river, I think.

I think you would have to concede that there is some relationship to this city.

Senator WARNER. But we have, this Congress, expended substantial sums of money to build two large airports elsewhere, BWI and Dulles.

Mr. SNYDER. No question about that.

Senator WARNER. Thank you very much.

Mr. ANDERSON. Thank you, Senator, for coming this morning.

Mr. HARRIS. This point is one that so many of us have been over, if I can say to my distinguished colleague from Kentucky. Maybe my colleagues do get a little bit bored about the discussion of the pro-National Airport against anti-National Airport as if the question were in absolute terms, if you keep National or do away with National.

In a very real respect, what we are trying to do here is to come up with those rational legitimate restrictions on the operation of Nations so that it can survive as a convenience to many people. If it comes down eventually in some sort of absolute terms of moving all traffic out to Dulles, many of our constituents will suffer tremendous inconvenience too.

Both Joe and I would like to figure out ways to have National operate, but operate in a way that really does not create havoc on the community. This is really the part of the overall fight.

Mr. BARNES. That is the point I was going to make also. The thrust of your question is, aren't there balancing questions here and competing interests? What I think the testimony of all the members of this panel has addressed is the fact that we want to keep this airport alive.

We want it to operate as a good neighbor and as a responsible institution in the community, and there are certain steps that can be taken which are not extreme that can assure the people that we represent that their interests are being looked out for while we can

take into account the other interests that are important to the U.S. Congress.

In the proposals that have been made in the testimony presented this morning, no one here has suggested that we shut down the airport. Everyone has made some proposals with respect to modest improvements in the way the airport is permitted to function so as to make it a better neighbor.

Mr. FISHER. Could I add, Mr. Chairman, that none of us is suggesting that National be even cut back, except as compared to what the FAA is proposing as an increase.

I would be willing to go with the present 15 million passengers a year and not increase that by 3 million, which is 20 percent or so.

That would be a reasonable way to go and would hurt nobody. Nobody would be hurt by that, the commercial enterprises at National, the airlines, or anybody.

The other thing was said by one of my colleagues. It is not as though there are not good alternatives for the growth that is foreseeable in the coming years. There are good alternatives, and they will be well served by transportation downtown in a very short time.

Mr. ANDERSON. How would you suggest improving ground access to Dulles and BWI Airports?

It seems to me to begin shifting traffic to those airports in a wholesale manner will require development of faster service to the downtown areas.

In your opinion, what improvements in access are needed and how should they be paid for?

Mr. HARRIS. Mr. Chairman, let me say that we have, I think, the basis of a very fine transportation system for this National Capital area. We have already done the economic feasibility study with respect to extending Metro out to Dulles. We can get fast, clean, convenient service from downtown Washington to Dulles by such an extension.

The right-of-way is very, very available. The construction is very modest compared to what we had to do downtown to get our core system started with tunnels and what have you, and one of the most important things we could do for the access to Dulles would be to get started on the planning of an extension of Metro from the current West Falls Church Station, as I recall it, up through the right-of-way to Dulles.

I think of all of the things we could do, this would be probably the most sensational development, as far as adding to the access of Dulles.

Mr. ANDERSON. Would a shift to Dulles and BWI have a significant impact on automobile fuel usage in the Metropolitan Washington area, and how much of a role should this play in the decisions that are made?

Mr. HARRIS. I think my previous answer alludes to it. If in fact we were able to develop the type of mass transportation system to these airports, especially the susceptibility of Dulles to this, we could save on fuel usage.

Mr. LEVITAS. I just got a message I have to leave for a few minutes.

Before our colleagues left, I wanted to commend them for their excellent presentations. I live in the community which is suffering from noise impact, and I understand many of the types of substantive as well as practical problems that each of you are facing on a daily basis.

I want to just clear up, however, one matter that I have heard referred to several times this morning, which I think does a disservice to the considerations which this committee must pursue. That is the suggestion that decisions will be made on the basis that Washington National is a congressional airport, and that decisions will be made because 435 or 535 people find it more convenient.

I would point out that the reason National Airport has the tremendous volume of traffic that it has is because it is serving the public, not Congress. Obviously, there are flights that go into Dulles and BWI, but the public, forget about Congress, the public feels it is more convenient to fly into National Airport and, indeed, it is, if you are going to transact business in the District of Columbia or in the surrounding areas.

I think it is important to remember that people, given choices, maybe besides Congress, have chosen to fly into National Airport rather than to Dulles or BWI because it meets their needs as part of the travel problem, and I think that based on past actions of this committee, while we have some furious fights and disagreements on a lot of policy issues, I think they have been made to the extent we are capable of making them as we see them in our best judgment on what serves the public interest best, taking into account those people in the immediate area as well as the national public interest.

I don't think it is constructive to suggest that the decisions will be made because it is easier for some of us traveling back and forth to our districts to come into National rather than into Dulles or BWI.

Mr. HARRIS. My statement deals with this and my colleagues will agree. When we reached this judgment, it is, believe me, with the full knowledge of the convenience of National to many of our constituents.

Let me say that we hear that side of it, too. The judgment that we have reached is an understanding that our constituents are going to have to make the sacrifice of convenience in order to achieve better protection for the quality of life.

This was a judgment that each of us had to reach, because it was with full knowledge that the traffic backup on holidays or weekends at National Airport is not caused by 435 Congress persons.

It is caused by a great usage of National because of convenience. We understand that, but it is a sacrifice that we simply have to make if in fact we are going to protect the quality of life in northern Virginia.

Mr. FISHER. Could I comment further to your question, Mr. Chairman?

Nothing traumatic would happen if the suggestions we make are put into effect. National would go on serving at least as many as it does now, but the increment of growth would be channeled to the other airports and that would come on gradually. It wouldn't be a sudden, devastating blow to anybody.

Those of you who come into National now would continue to do so and the same for our constituents, whoever they are.

The other thing I would like to mention again is that in the shorter range for Dulles Airport we will have the I-66 and a connector road built to the same standards, so that you can go from Dulles Airport right now to Constitution Avenue on an interstate highway-type mode, no stop lights of any kind, very fast moving.

There will be easy bus and limousine service, fast service. That is going to be in place in a very few years, in a very short time. This would come about long before we could extend Metro.

When that happens later on, then there is an additional way of doing it.

Mr. BARNES. I mentioned in my testimony this soon-to-be operational Amtrak station at BWI. You can get to BWI now on recently vastly improved bus service in about 35, 40 minutes from here. I have done it, and I was surprised how fast you can do it, and the new Amtrak station will permit you to just go over here and get on the train and go right out to BWI and get on the airplane, so we are already moving toward vastly improved access to both airports.

I strongly support Congressman Harris' statement with respect to extending the Metro line out to Dulles, which would improve access to that airport as well.

Mr. HARRIS. I thank my colleague from Maryland.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you, Mr. Chairman.

I want to commend my colleagues for being here and the fine statements on behalf of their constituencies. Like Mrs. Bouquard, we have a different constituency that we are concerned with too.

I was interested in your observation about the additional ground access to the West. You had indicated that it would allow people to come into the Nation's Capital and the White House.

I have noticed most of the air traffic out of the White House is by helicopter out to Andrews. We do have several big moving vans we are going to bring in from the West about the middle of January, and we would be most grateful, it will help to facilitate things.

Mr. FISHER. If I could say—

Mr. SNYDER. I know you will want to.

Mr. FISHER. We will have to persuade FAA to let moving vans onto the Dulles access road, and that won't be easy.

Mr. SNYDER. In a more serious vein, I understand that because of the amount of ground traffic between here and Dulles now, that they limit the local traffic to pool cars, and I understand that is going to be true on I-66 or at least during peak hours which most of us are going in and out during the peak hours.

I wonder if that does not indicate the fact that they now have, and anticipate continuing to have sufficient traffic congestion that your solution probably won't really give us the access that we need.

Now, perhaps Herb's observation about the Metro would tend to be a more logical solution.

Mr. FISHER. Of course, there will be more congestion at the commuting hours; that is 3 hours a day, maybe. There will be more congestion. Ways will have to be found so that traffic to and from,

people to and from Dulles, will be able to make use of the interstate system right on downtown.

Mr. HARRIS. May I say to my colleague from Kentucky, I agree with his observation absolutely. The extension of Metro to Dulles is essential in the national interest, as far as making sure that this Capital has access to a very important international airport, and I do hope that and I think my colleagues will join with me in those efforts to make this come about.

Mr. SNYDER. I also heard an observation you made very recently in your comments.

Those of you that come into National would continue to do so, making reference to your endorsement of cutting the number of air carrier slots, not increasing the size of the plane and not increasing the distance.

I have a little trouble understanding that because obviously if you cut four air carrier slots per hour that means that three destinations per hour will be eliminated.

We, of course, would anticipate they do that on an economic basis, that is, the airline, but whoever happens to be commuting here from those four destinations per hour would they still come into National?

I don't understand that.

Mr. FISHER. Well, some of them would fit into the larger planes that still would come in. The number of passengers coming in would remain the same. There would be some shifting.

Mr. SNYDER. If you go to larger planes, that's right, the passengers theoretically would remain the same, but those larger planes are going to come from a destination within the 650-mile limit, and there will be four per hour cut out?

Mr. FISHER. I think that in the main those of us who commute or come into National would continue to do so. Probably there would be a few who would lose out and a few who would gain because there would be more passengers, bigger planes coming from Atlanta or wherever it might be.

There would be a small percent of members or any group in the population who might lose out a bit, and there would be a small percent who would gain, but with the overall passengers staying the same, chances are that most people would be unaffected.

Mr. SNYDER. As I observed earlier, you are here doing what you ought to do, protecting your constituents, but I am concerned that one of those four per hour would be Louisville, Ky., or Cincinnati, Ohio, and I think that is the same concern that many of us have representing our constituents who need to get to the Nation's Capital to take care of the bureaucratic redtape that is being put upon them.

Mr. FISHER. Frankly, I will concede that there will be a few places here and there that might lose one flight a day. There will be other places where more passengers can be served, and there will be some changes of that sort.

I have thought quite a bit about this, and I have checked out Chattanooga and Atlanta and a number of places, and believe me, by and large, members or any group that uses National will not be significantly affected. A few individuals will, some favorably, some less favorably.

Mr. SNYDER. Since deregulation many of us have already seen our cities that perhaps have a little lesser traffic coming here than others where they can put their equipment, dropped. Louisville has lost a flight, two flights a day each way on Eastern; and we think one of them will be picked up by Piedmont, but those are problems that we have, too.

I also, in this same vein, observed in Senator Warner's statement, which I take to be accurate, that today almost 2 out of 3 Virginia passengers depend on Washington National as their vital connecting link to the Nation's air transportation system.

I would assume that in northern Virginia that the ratio, since that is Virginia as a whole, that the ratio in northern Virginia might be 9 out of 10, or some higher ratio anyway, and I would assume a substantial number of your people depend on that, too.

If you cut down the number of flights out of there and into there by four an hour, aren't we going to adversely affect those 2 out of 3 Virginians, 8 or 9 out of 10 northern Virginians and a substantial number of 8th District Marylanders who depend on Dulles or Washington?

You are going to say Dulles is closer to your people, but go ahead.

Mr. HARRIS. No; as a matter of fact, it is probably closer to Joe's people than mine. I want to put it on the table here as far as what we are saying.

There is no question that the quality of life protection that we are talking about is going to be at the convenience of a number of people. I don't think we should kid about that.

What we are saying is that sacrifice is necessary if we are going to protect the quality of life. I want to say to my colleague from Kentucky, to the extent that there is a modicum of inconvenience placed on any resident of Kentucky or Louisville, I want to join with him in making the Kentucky Derby a national holiday.

I want to help the people in Kentucky any way that I know how if, in fact, my colleague from Kentucky can help my people achieve the tranquility and peace of mind that has got to be achieved for them in this day of too much noise and interference with their community.

Mr. SNYDER. I appreciate that observation. I would hope that you would also get us a week's recess, because those of us—

Mr. HARRIS. I will be for that.

Mr. SNYDER. Immediately prior to the Derby, those of us who have to go in Thursday night find our livers out of prime by the time we get there.

Mr. FISHER. The wonderful filly that won the Derby this year comes from my district.

Mr. SNYDER. I really don't know how to respond to that. You do know where to go to get a fast track. She hasn't done too well since.

Mr. FISHER. Second isn't so bad in the mud.

Mr. SNYDER. Let me get back, and I know we are keeping you a long time.

I do want to ask this, as I understand that FAA a couple of years ago attempted to change the flight patterns into National on the theory that all the traffic basically now is from the north, the river

approach, Mount Vernon approach from the south, the theory that they would distribute this noise out over a bigger area and not have the concentrations, and that the surrounding communities objected to this strenuously.

Maybe you can observe why that was so and tell me if there are any local initiatives that are being discussed perhaps with the Advisory Committee that you made reference to as to changing the arrival and departure patterns.

Mr. BARNES. My memory is our County Council in Montgomery County has advocated a scattered pattern of approach and departure from the airport. Whether my memory is correct or not I want to confirm for you, but I know that some local body has recently taken a position in support of it and it has been my position that we ought to—

Mr. SNYDER. I may be in error as to why it was unsuccessful.

Mr. BARNES. There was an effort about 2 years ago or so to do so. It was opposed.

Joe can explain it. Our community is on record as supporting it.

Mr. FISHER. Obviously, with so many people in these flight paths, you are going to get local difference as to how the paths and the routing should be done.

What happened about 3 years ago was that FAA up out of nowhere decided to shift a certain number. They were going to scatter it more toward Virginia, which was fine for the Marylanders and objected to by the Virginians, and the public bodies and everybody passed the appropriate resolution.

This is a problem you are going to get always among neighbors. Now, the real solution to it, of course, is not to have all the extra and so many flights coming right into the heart of a metropolitan center where, as I say, about a cool 1 million people are seriously affected, but to have the growth occur at larger outlying airports, where there is buffering of low-density development or no development at all.

That would greatly reduce those tensions that we have around here every time somebody proposes even the slightest change in the flight patterns.

Mr. HARRIS. Really, the last couple of sentences that Joe alludes to, that is the key point with regard to efforts like this, to alleviate by scattering by sharing the burden in the community. I don't have to tell my colleague how difficult something like that is to work out. Maybe on this or something else, we have all had the experience of trying to do that. That type of approach has a great deal of merit.

The problem 2 years ago and the problem today would be most folks would view the scatter approach as a method of expanding further the amount of intrusion in the total community. If in fact we were working on a basis where we were assured we were holding, reduce a little bit the amount of traffic that was going to intrude on the community and then we said we could get the communities together to work out some sort of a sharing the burden approach, I think we would have a chance.

In the current area, well, the more they scatter it the more they will grow and the more flights we are going to have, and we don't have a chance in that regard.

Mr. SNYDER. Let me make this observation. I think it is somewhat consistent with your statement. I lived out in Annandale in the late 1960's and I moved into Baileys Crossroads, made a little money, and then I moved into downtown Washington, and in making those three moves and buying and selling that property I observed, as I came toward National Airport, that the value of the similar pieces of property increased about \$2,000 a mile.

Mr. HARRIS. It was just that you were getting closer to the 8th District.

Mr. SNYDER. It may be, and I have also observed during my 16 years here, as I drive out I-95, that there has been tremendous development and a tremendous large number of housing units built all long, in close to National Airport selling at tremendous values.

Folks back home ask me what I do. I say, I work up there where the land is high, and it doesn't seem to deter these people from buying those very expensive dwellings right in close to National Airport. There have been a lot of nice developments going in there in the last 16 years when all this problem has been existent.

I would have to say to you that I think they know what they are getting into and then, of course, obviously want to complain about it. I would observe to you too, Herb, in regard to your 11:30 calls, I had a lady call me at 6 in the morning about her garbage not being picked up recently.

I found out what community and I asked her who the contractor was, and I said, "Did you call the contractor?" She said, "No, I didn't want to start that high."

I knew the contractor and I told him to be sure her garbage was picked up the following week and he did; and I called her at 6 to ask her if it was all right.

You might observe some good clear night about when the planes get in on time and call them at 11:30 at night and say, "How was it tonight?"

Thank you very much.

Mr. FARY. My impression is that the Members from Virginia would like to see business go from National to Dulles.

Would you feel as strongly about reducing operations at National if the traffic goes to BWI, Baltimore Washington International Airport?

Mr. FISHER. I would like to make two comments.

One is I am not proposing a reduction of the traffic over the number of passengers into National now. I am proposing a reduction of the increase that the FAA is proposing. On your main question, obviously the growth increment should be shared between the two airports, Dulles and BWI.

One reason I proposed looking into some different ownership of Dulles and National is that the FAA just really is not set up to promote an airport and Dulles is losing a bit to BWI, which is a State airport and is much better promoted.

There would have to be a sharing, and I would think competition ought to be the main guide to how the sharing is worked out.

Mr. HARRIS. I would like to make it clear, my proposals with regard to limiting and in some cases reducing the amount of traffic at National is not geared to where that traffic would go. It is a

question of trying to restrict the traffic at National, not increasing the traffic at Dulles.

It is in accordance with my objective to reduce the growth at National.

Mr. FARY. My next question, what would the members of the panel consider a more important goal, an earlier effective curfew or a reduction of the number of available slots?

Mr. FISHER. Some of each, please.

Mr. BARNES. The two do go hand in hand.

The list that Congressman Harris went through, the schedule times, that shows how crucial it is to do something both about the curfew and, as you suggest, making it effective.

You use the term "effective curfew," and that is a terribly important part of this, but the two go hand in hand, reducing the total volume is a key factor as well.

Mr. FISHER. I agree.

Mr. ANDERSON. Mr. Goldwater?

Mr. GOLDWATER. Thank you, Mr. Chairman.

I would join my colleagues in welcoming the Representatives from this particular area who are addressing themselves to very difficult problems, one of which is the same, that Members all over the country, from time to time, have to struggle with; it is not an easy problem.

This committee, in trying to address itself to the whole question of noise and aviation, found that it is likewise a very difficult problem.

I don't think you can just look at the whole impact and question of transportation in meeting the needs of the public in a very singular kind of way.

One thing I want to be very clear about here; are you addressing yourself to National Airport, and about limiting passengers or limiting operations?

Mr. HARRIS. My testimony is basically the number of flights. The way you come to grips with this problem is that you can introduce planes capable of carrying more passengers and keep the same number of flights, which I think creates a great deal of additional problems at National.

Let me say that I did not hear any of my colleagues really suggest any policy that would reduce the number of passengers currently using National Airport. What we are trying to do, to the extent possible, is hold and perhaps reduce the number of flights that are intruding upon the air space of northern Virginia.

Mr. FISHER. I think you have to be concerned with both the number of passengers and the number of slots.

I would like to see the number of passengers held approximately where it is increasing, if at all, only very slightly and well below the increase proposed in the FAA policy statement.

Mr. GOLDWATER. How do you relate passengers to noise, though?

Mr. FISHER. As we go to wider planes, and they are proved out to be safe, then there can be fewer slots. The two go together. You bring more in per plane and there are fewer slots, and this is the way I see it unfolding.

Mr. GOLDWATER. All right; so I would assume—

Mr. FISHER. Once the annoyance of noise is reduced quite a bit by having fewer planes going overhead.

Mr. GOLDWATER. So I assume then that none of you really has any problem with the introduction of the wide body, as long as those aircraft meet the safety specifications?

Mr. BARNES. I would support it strongly, if that will reduce the number of flights. And it will also help us conserve energy, obviously.

Mr. FISHER. I think you could work out a way of doing that, let's say, for each wide-body operation that comes in you would reduce the older slots by more than that, maybe two. I don't know how it would work out, but this should be the guide, it seems to me.

Mr. GOLDWATER. The Air Transport Association advocated more flexibility in these slots. They call it a variable hourly slot allocation.

Do you have any real problem with that?

Mr. HARRIS. I do not to the extent that they are actually enforced. In fact, if a system can be achieved that does not negate a true curfew and does not in fact add to the flights, then I have no basic problem with the concept.

Mr. GOLDWATER. Now, these airports are greatly utilized right now, 60 percent for National, 16 percent for Baltimore, and 16 percent for Dulles.

There is greater use capacity for all of these airports. You are advocating pushing a lot of the traffic from Dulles to Baltimore? They are not very convenient, and the public transportation is not very good.

You are talking about a Metro extension. When do you anticipate that that would ever come about?

Mr. HARRIS. May I say to my colleagues, because it is in fact my suggestion, it will come about like everything else in modern transportation, about 10 years after it should have.

The challenge today is to go ahead and make that preparation. I do think that the construction for the additional highway access to Dulles is already underway and is about to be completed in the next year or year and a half.

May I say to my colleague, though, if you really want to see poor highway access to an airport, check on National. Check on National the night before Thanksgiving, or check on National on a Sunday night after a 3-day holiday. It is incredible.

If there is a way to bring absolute hell on Earth with regard to transportation, National has achieved it with respect to transportation.

I don't think any Americans should be subjected to National Airport during one of its rush days or nights. It is absolutely terrible.

Mr. GOLDWATER. That is an exception. That happens at all airports in Los Angeles or Chicago.

Mr. HARRIS. Nothing like this. I don't know whether you have gone through it. I know you are very familiar with Northern Virginia, but I don't know if you have ever gone through it the way National is today and one of those rush nights.

Mr. BARNES. The Secretary of Transportation described it, as I said in my testimony, as a dump and a disgrace because of the way it presently operates.

Mr. GOLDWATER. I would submit to you that 95 percent of the time, National Airport is right around the corner, I can make it to the airport in the rush hour in 15 minutes. It takes me an hour to get out to Dulles. I suspect that it is just like every other airport on holidays. There is tremendous congestion and it could stand some improvement, but that is not a sufficient reason to move traffic.

The traffic is bad at National; it is going to be bad at Dulles too. People like National because it is convenient. That is true with any mode of transportation; if it is convenient they will use it and they will like it, and that is one of the reasons why National is so important.

One thing you never hear discussed in all of this is the economic advantage of National for aviation. Obviously, the location and the availability of National Airport close to the commercial sections of northern Virginia and Washington make a tremendous contribution to the quality of life that you are concerned with, that is, having a job.

If you greatly reduce the availability of National Airport, you are going to have to pay a price for that, from an economic standpoint, it seems to me.

Mr. HARRIS. We have not suggested that.

Mr. FISHER. We are in total agreement with you on that. I have to keep reminding all of us that none of us is suggesting a diminution of the number of people coming into National. That is not in the picture.

There will be just as much business out there as there ever was, and it may even increase a little, but we wish to see the growth from now on be channeled mainly to the other airports and there is a marvelous opportunity for the appropriate industrial, trade, business development around those other airports.

Whereas the possibilities around National are beginning to be foreclosed for lack of space, or terribly high land values, but we are not suggesting any diminution in National.

Mr. GOLDWATER. One big problem that I have observed about Dulles Airport, and if you want to push more traffic out there, you really have an access problem that has not been taken care of by the planners in and around Dulles Airport.

They have allowed tremendous growth in population out there, but have not provided for access roads to those homes and to those commercial establishments.

The Dulles access road was a dedicated road for Dulles Airport, and now you are seeing the majority of the traffic on the Dulles access road is comprised of people who live out there, who go out there and make the Dulles loop. I go out there during rush hour and I get bogged down, and it is beginning to look like the Los Angeles Freeway, and yet you are advocating putting more traffic out there.

That is a problem that has to be addressed. Maybe I-66 will do that.

Mr. FISHER. A big improvement is just over the horizon now. In just a very short time I-66 will be completed and opened and there

will be a connecting high-speed, no stop light highway over to the Dulles access road.

Further than that, the State has authorized the sale of bonds to construct a toll road parallel to the Dulles access road. Beyond that is the marvelous possibility of a surface Metro line. There are problems, to be sure, but we are not standing entirely still on it, but things are moving to improve transportation out there.

Mr. GOLDWATER. One last question: You advocate banning general aviation after 10:30 in the evening at National Airport.

Mr. FISHER. I have not spoken to that. I would like to hold a tight control on all types of aviation. If I can be persuaded that the general aviation in limited amounts in small planes would be the extent of it, that is another matter. I would like to show some flexibility on that.

It's the noise plus the safety that bother me, and whatever is necessary to do and to make it thoroughly safe and to cut down noise, I would like to do it.

Mr. GOLDWATER. How many people now are adversely impacted by National Airport?

Mr. BARNES. It has got to be a couple of million.

Mr. FISHER. I used the conservative figure of a million. The metropolitan region is a little over 3 million, and if you take a band up and down the river and a certain distance back from the banks of the river, depending on how far back you go, you don't have to go very far to embrace a million people, which is a lot of people, and you just try having a barbecue in the back yard of any one of these million people in the summertime, say 6 o'clock in the evening, and you will see what an impossibility it is to enjoy the occasion.

Mr. BARNES. I gave a speech 2 weeks ago at a home out in Potomac, Md. Literally, because people couldn't hear, I had to stop speaking about every 1½ minutes for 25 seconds or so while the plane went over. People literally simply could not hear as the plane went over, and I don't know how many miles, but many miles from the airport.

I hesitate to guess, but it is a substantial distance up river from the airport, and the noise pollution was such that you literally could not hear somebody 10 feet away talking as the planes went over every 1½ minutes or so.

Mr. HARRIS. Our experience goes from 10 to 12 miles. If I may say to my colleague that we have had the experiment of extending some flight paths out 10 miles on the south range, and the pollution and impact, even at the 10-mile range, is very severe.

Mr. GOLDWATER. Isn't it true that a majority of these people who are impacted by this noise do not want to see a reduction in flights?

Mr. HARRIS. My judgment is that that is not correct, if I may say to my colleague. They would very much like to see a reduction.

Mr. BARNES. That is my view as well.

Mr. FISHER. I am convinced that that is the case. There are those million people who hear the noise every other minute during the rush hours. The number of people who travel very often in and out are small. There is a lot during the course of the year, but many of

them come in just a couple of times during the year, but this is incessant to a million people.

It is every day, morning and night; it never stops.

Mr. GOLDWATER. I am an impacted resident of National Airport. I live about a mile into runway 18's flight path just up the river. I have learned to live with it. I don't particularly like it, and nobody likes noise. Sometimes I get more noise from my neighbors than I do from the overhead flights, but I have learned to accommodate and live with this noise.

We all adjust in our own way. It doesn't particularly bother me because I happen to enjoy the convenience of National Airport and I am not one who is complaining.

I am sure there are others who dislike it severely. I am not totally impressed that everyone is impacted by this, and that everyone would like to see National Airport plowed into the river.

Mr. BARNES. Nobody here today is advocating that.

Mr. GOLDWATER. The thing that impressed me by this proposal by the FAA, which you seem to support, is that it is not really a major reduction in flights at all per minute or per hour.

Mr. HARRIS. It is not.

Mr. GOLDWATER. It is 1.6 to 1.5, so you are not really getting any relief.

Mr. FISHER. We will take whatever we can get.

Mr. GOLDWATER. You don't want to see any growth from this point?

Mr. HARRIS. Yes, sir; as far as flights are concerned and as far as the total impact on the airport is concerned. If I may say to my colleague, I can't help but recall the people in California felt so strongly about the noise impact of your Los Angeles Airport to the extent that you have a most unique situation as far as takeoffs at that airport are concerned.

Well, this airport is surrounded by densely developed communities. They don't have that alternative to use, and that is why we have got to do something very significant as far as limiting the amount of additional intrusion into the community that can occur if we don't take action.

Mr. FISHER. May I make a comment on your statement, which is very true, that people do become used to noise. It is a very short story, but it has a lot of impact to it.

I served on a national commission a number of years ago when the SST was up for consideration. Before I was in Congress I was a member of a Presidential Commission that made some studies of this, and we had some medical experts come before us.

One of them, Dr. Renee Duboise, was head of the Rockefeller Institute, and has written many wonderful books and he is also a lover of music.

He said he had taken some interest in the reaction of people and hearing to extreme noise. The evidence is pretty clear that nowadays youngsters, as they come along and get to be close to 40 find that their hearing is impaired in serious ways that they don't know about.

They learn to tolerate noise, and so on. The higher pitches and registers make no impression on most of the people who have grown up in the noise age.

He said furthermore, musicians no longer hear the nuances and the most wonderful and delightful parts of music. He said it is worse than that, the conductors of the orchestras no longer hear the way they used to. To carry it to the ultimate, he said the composers wouldn't hear it either. They will have to do it out of memory of music they heard before their hearing mechanisms had been beaten down.

Well, I am telling this story to illustrate the danger it is, that it is so easy for us to become used to these things.

We don't realize that we are going to lose some of the most precious elements in our whole culture. Reflect on that story a little bit. I certainly have, and I don't like the implications of it.

Mr. ANDERSON. Mr. Mineta?

Mr. MINETA. Thank you, Mr. Chairman.

Having come from local government, I really feel right now that I am sitting at a city council meeting or in a planning commission meeting as I am listening to your testimony.

First of all, mention has been made about both I-66 and the availability of taking Metro out to Dulles.

What is the schedule on I-66, Mr. Fisher?

Mr. FISHER. I think somewhere toward the end of 1982 it is supposed to be completed.

Mr. MINETA. And that will be again where you can get onto I-66 from or at Dulles?

Mr. FISHER. No; the connecting link across there, the environmental impact statement is due any day and then there is a period of discussion, but the land, as I understand it, has been acquired a couple of miles across there and that won't be finished at the same time as the I-66, but it should be finished shortly thereafter.

Mr. MINETA. That would cut the travel time from Dulles in half?

Mr. FISHER. Oh, way, way, down, because it would be an interstate standard highway all the way on to Constitution Avenue, or if you wanted to go over the 14th Street Bridge, it would be all the way to Capitol Hill.

Mr. MINETA. What about some decision on the part of Metro, on that portion from West Falls Church to Vienna? Will that have an impact on any alignment problem or engineering problem as it relates to trying to get Metro out to Dulles from a cost standpoint?

Mr. HARRIS. I know of no decision which changes the basic alignment decisions with respect to what we call the Vienna route.

What most of us have talked about, quite frankly, going back a number of years, is tracks going off, before you cross the Beltway, that would go directly up to Dulles. And in precise terms, the decisions that I have heard in recent weeks have tended to expedite the construction of the lines, and in no way would cause any problems as far as the Dulles type of extension is concerned.

Mr. MINETA. So from a cost/benefit perspective, you don't feel whatever Metro is doing will be adverse to ending the line?

Mr. HARRIS. No; there is no question that there is sufficient traffic north of Nutley Road Station today, and especially in the future.

The Dulles spur is economically feasible, was economically feasible, and in my opinion should be built.

Mr. BARNES. Mr. Chairman, I apologize, I have to leave for another meeting.

Again, I very much appreciate the opportunity to appear before the subcommittee.

Mr. MINETA. Thank you, Mike.

The other thing I would like to ask about the limitation on extra sections, is that something that you are advocating, limitation on extra sections?

Mr. HARRIS. I think they should be counted, yes. I think extra sections should be counted, because they are a flight just like any other flight, and the notion that you can supposedly have a limitation on a number of flights and permit extra sections not to count and still get that limitation is a complete anomaly.

Mr. MINETA. What are the risks to the Federal taxpayer being liable for noise suits, noise damage suits and litigation costs that are caused by National Airport, given, let's say, the Westchester case out in Los Angeles.

Mr. HARRIS. I am told such risks are in fact real and measurable. I would not pretend to be a legal expert in this regard, nor would my colleagues, I am sure, but I am told these risks are real.

Mr. MINETA. Looking at noise contour maps where you might leave the contours as they are now or shrink it, have these kinds of studies been made, do you know?

Mr. HARRIS. I think that they do have some semblance of noise contour maps. They have been trying to record noises around various stations around Dulles or National, but I have not myself seen them drawn on a map, but the data must be available.

I don't know what the quality of the data is but there is information.

Mr. MINETA. Well, I would like to thank our colleagues for the time spent here in trying to bring this whole issue to a head and your contribution today.

I thank you.

Mr. ANDERSON. Mr. Ertel?

Mr. ERTEL. Thank you, Mr. Chairman.

I have been listening to the testimony of the two gentlemen from Virginia, and I appreciate it very much.

Gentlemen, most of your testimony is aimed at cutting down the number of operations per hour, and you are basically in support of the 36 operations per hour for air carriers. As I understand it, really all we are doing is reallocating, because with the proposed policy you are going from 40 an hour to 36 for the scheduled operations.

The commuters are going from 8 an hour to 12 an hour, so all you are doing is changing from one kind of scheduled air traffic to another. Your number of operations will be the same. It will be just different type aircraft.

Do you have any comment on that at all?

Mr. FISHER. Well, my starting point is number of passengers, and as we bring in larger planes we ought to cut down the number of flights in and out, and that is the way I would approach the matter.

Mr. ERTEL. Well, I guess what I would have to say is, if you assume for a moment that we have a maximum demand for that

airport, that the demand is continuing to expand, and that we are still going to keep the flight number the same then all you will do is make larger aircraft and you are going to increase your passenger load for the scheduled airlines and change some of those flights to commuters.

Now, if you are really concerned about the number of operations, you have not changed the number of operations at all. Now, if you are concerned about noise, which is a valid consideration, then you should decrease the number of air scheduled carriers from 40 to 30 and they should use a quieter, wider bodied aircraft. Thus you might cut your noise down. You can also change that four slots per hour to commuter, which I would assume are less noisy than the scheduled operators, and you probably reach that objective.

But I am not sure you have accomplished any other objective as far as safety is concerned, if you are trying to decrease the number of operations.

Mr. FISHER. I can only repeat, Congressman Ertel, I would suggest we keep our eye on the number of passengers and remove slots as might be necessary to offset the fact that the average size of the plane increases.

Whether it is commuter or otherwise, I would still follow that general approach to dealing with the problems.

Mr. ERTEL. What is the ultimate objective? Is the objective to decrease the number of operations from National or is it to decrease noise at National?

I don't think limiting the number of passengers will necessarily decrease noise.

Mr. FISHER. I think it will, in view of the trend toward larger planes for commercial operations and longer distance flights; I think it will.

Also, if we substitute smaller commuting planes, that too is likely to reduce the noise, but if we could do it all in terms of noise standards, that would be an approach, but I don't think the technology or the art of measuring noise is quite up to that, so if you like, limiting a number of passengers is a good proxy.

Mr. HARRIS. If I may, coming in through the other door might make it a little clearer. If in fact the large size jets, the additional jets, do not operate also to limit, to reduce the number of flights, what we have is additional congestion at National Airport and exacerbate the ground problems that we already have.

What my colleague and I would advocate very strongly is that the introduction of those planes to carry additional passengers would be used as a method of reducing the number of flights so that we can in fact control the amount of noise intruding upon the community.

Mr. ERTEL. Well, I guess you have to make some basic assumptions. One, you have to make the basic assumption that when you decrease the number of scheduled carriers fact they are going to increase the size of this aircraft. Also you are still replacing it with other aircraft, at least those four, which are commuters and which should be, by definition, smaller aircraft.

Therefore, your numbers aren't going to change sizably under this situation at all. If you are flying for four of those flights smaller aircraft, it depends on what the mix is, of course, but I just

think you have some very basic problems. We have to start out and say what are our objectives.

Our objective is to decrease noise on operations. For safety purposes, if our objective is to decrease noise, we ought to look at the type of aircraft and ban the type of aircraft that creates the noise and try and move to the less noisy aircraft.

If we are trying to serve a multitude of areas within a 650-mile area, then you need a maximum number of operations with quieter aircraft, if you want to serve that area within 650 miles.

Senator Warner said he wanted to make sure that that was available for Virginia with the commuter-type traffic. Maybe we ought to be saying this airport should be used only for commuter type traffic for the short haul and, in fact, that may wind up reducing the noise and giving you availability to a wider range of people. Also going back to what I thought was the original plan, we might use Dulles for the long-haul carriers and maybe we should do that instead of going to 12 commuter operations an hour.

Maybe we ought to be going to 20, and wouldn't that serve your function depending on the noise level of the aircraft?

Mr. FISHER. It seems to me that is a logical approach, but it gets you into a great deal more governmental determination of which routes and what kinds of planes and all of that, and it seems to me, to involve less regulation and less difficult decisions by government administrators, if you take a number of passengers' approach and allow a good deal of flexibility then within that, but your approach is a possibility, no question.

Mr. ERTEL. If you take a number of passengers and you reach the ceiling, someone is going to make a judgment as to who is going to fly in with those passengers, and you are going to have a lot of Government regulations when you hit that ceiling because everybody will be jockeying for a position.

Mr. HARRIS. Your approach is not inconsistent with the objectives of my colleagues.

Mr. ERTEL. Thank you. The commuters are not subject to noise standards which might create another problem here.

Mr. HARRIS. That is right.

Mr. ANDERSON. Mrs. Bouquard?

Mrs. BOUQUARD. Thank you very much.

I would like to be very brief.

I do thank you for being with us for this lengthy hearing. I think what we are talking about is safety. None of us are insensitive to this safety issue.

We should be concerned about a quality of life on a national level, involving all of our airports. Personally, I fly about 1,500 miles a week and it is not one of my favorite pastimes. I go into Atlanta-Hartsville Airport, and because of deregulation the backup at this airport and the increase in traffic is frightening.

It terrifies me, not only for my safety but the safety of the people that I represent. OK, if we go to this 1,000-mile nonstop perimeter, what we are going to do, we are going to increase more traffic at our large hubs and not see any traffic come into our median hubs where we do need the relief to protect these people that are having to go into this high area of density of air traffic, and this is the area that I think we have missed out on in bringing up this issue.

Safety, yes, but are we approaching it on a national level? I think not with this approach, so I do hope that this one area is considered. The safety of the people that need service from the median hubs that are forced into these large airports that obviously cannot take care of the traffic, that is forced upon them as a result of deregulation.

I thank you for that.

Mr. ANDERSON. Mr. Rahall?

Mr. RAHALL. No questions.

Mr. ANDERSON. Thank you very much, Herb and Joe, for a very excellent presentation.

Mr. HARRIS. Thank you.

Mr. FISHER. Thank you, Mr. Chairman.

Mr. ANDERSON. Our next witness, is Mr. Karl R. Sattler, administrator, State Aviation Administration, Maryland Department of Transportation, accompanied by Nelson K. Ormsby, special assistant.

Mr. Sattler, the full text of your prepared statement will appear in the record at this point.

[Statement referred to follows:]

STATEMENT SUBMITTED BY KARL R. SATTLER, ADMINISTRATOR, STATE AVIATION
ADMINISTRATION, MARYLAND DEPARTMENT OF TRANSPORTATION

Thank you Mr. Chairman and Members of the Committee. I am Karl R. Sattler, Administrator of the State Aviation Administration, Maryland Department of Transportation. I appear before the Aviation Subcommittee to outline the role of Baltimore/Washington International Airport (BWI) as one of the three air carrier airports serving the greater Washington area, and to highlight comments previously filed with the Federal Aviation Administration concerning the proposed policy for the operation of Washington National and Dulles International Airports.

In addition to owning and operating Baltimore/Washington International Airport (BWI), the Maryland Department of Transportation, through its State Aviation Administration, has a legislative mandate that it assist, cooperate and coordinate with the federal government in the development of aeronautics in the State (§ 5-204(c)(3) Annotated Code of Maryland, 1977 Volume and 1979 Supplement). My comments today, therefore, reflect Maryland's unique status as the owner and operator of the only non-federal air carrier airport serving the Washington area, and as the agency charged with the supervision and development of aeronautics in the State of Maryland.

The State of Maryland, in purchasing the then Friendship International Airport from the City of Baltimore in 1972, initiated a massive reconstruction program, thereby enabling BWI to efficiently serve its growing Baltimore-Washington service area. By November, 1973, the Airport had a new name reflecting this bi-regional service area—Baltimore/Washington International Airport—and Maryland launched an ambitious two-fold plan to upgrade, improve and modernize all Airport facilities and services. The airfield upgrading phase, completed in 1974 at a cost of \$30 million, provides BWI with a runway/taxiway system capable of handling the heaviest and fastest equipment in the commercial aviation fleet, including the Boeing 747 and Anglo-French Concorde SST. The complete physical rejuvenation of BWI culminated in the September 29, 1979 dedication of the new BWI passenger terminal—a \$70 million structure capable of handling in excess of 11 million passengers annually, and including one of the most advanced facilities in the United States for processing international arrivals. The new terminal is also well designated for connecting service, and commuter air carriers serving BWI are strategically located near the center of the passenger terminal, thereby facilitating convenient domestic and international connections.

This terminal reconstruction and expansion phase of the BWI improvement program transformed the old 250,700 square foot facility into a modern terminal of approximately 675,000 square feet. Finger pier construction and available expansion area give BWI the flexibility to further increase its annual capacity to 20 million total passengers with only a minimal capital expenditure and minor disruption to passengers.

As the area's premier air cargo facility, BWI enjoys approximately a 50 percent share of the air freight moving through the Baltimore-Washington region. The initial complex of three buildings, completed in 1974 at a cost of \$4.7 million, contains 170,000 square feet of floor space. Additional facilities are in the advanced design stage, and ground-breaking in July of this year will result in additional ramp-served cargo facilities totaling 110,000 square feet. BWI is the only airport serving the Baltimore-Washington area with scheduled freighter service, and is the only facility in the region capable of handling a Boeing 747 Freighter with a CAS 314 maindeck loader. BWI serves as the Baltimore-Washington hub for four major international freight forwarders and air carriers: Airborne Freight Corporation, Emery Air Freight, Federal Express, and WTC Airfreight.

BWI's strategic location between the international city of Washington, D.C. and the world seaport—industrial complex of Baltimore make it the airport of convenience for the combined Baltimore-Washington market. An analysis of travel times, conducted by the Maryland Department of Transportation in cooperation with the Metropolitan Washington Council of Governments, and other similar studies, have demonstrated that BWI is of equal or greater convenience than Dulles International Airport for 80 percent of the residents of the Baltimore-Washington region. By the same analysis, Dulles conveniences less than 60 percent of these residents, and Washington National approximately 67 percent.

This geographical advantage is further enhanced by the extensive limousine serving BWI. Scheduled service 24 times to downtown Washington is augmented by a door-to-door service to the suburban Maryland counties of Prince Georges and Montgomery through the Airport limo terminal at Greenbelt, Maryland. Airport passengers using Metrorail service can arrange to be picked up at either the New Carrollton or Silver Spring Metro Station for transport to BWI.

Ground transportation to BWI from downtown Washington will be augmented in October of this year with the opening of the first intermodal passenger station in the United States to connect intercity airline and railroad routes. In addition to linking BWI with downtown Washington, the BWI-Amtrak air/rail passenger station will serve domestic and international air passengers destined or originating in a number of cities accessible by rail along the densely populated Northeast Corridor.

Even from this brief overview of BWI I believe Maryland's point is clear: the future shape of any proposed policy for Washington National notwithstanding, BWI is already serving the Washington area with attractive passenger and cargo facilities, and is striving to provide travellers with an increasingly convenient schedule of service. Both Texas International Airlines and World Airways, for instance, serve the Baltimore-Washington market exclusively through BWI. Significantly, both of these airlines offer the kind of deep-discount, low-fare service that Congress envisioned when President Carter signed the Airline Deregulation Act in October of 1978.

There is absolutely no doubt that Washington area travellers are using BWI in rapidly increasing numbers. The BWI ground transportation system reported a 17 percent gain in downtown Washington business for December, followed by a 12 percent increase in January over last year. In December the Maryland suburban areas of Prince Georges and Montgomery Counties registered a 20.9 percent increase over the previous year, and in January the increase over 1979 was 27.4 percent.

To help BWI overcome the long-standing perception that it served only the Baltimore market, the State of Maryland developed an aggressive air services development and marketing program. The air service development program, aimed principally at airline management, illustrates the advantages of serving Baltimore-Washington through BWI. The air services development program has been successful in bringing to BWI such airlines as Texas International, World, Republic, and Ozark. The marketing program has been instrumental in promoting BWI as a Baltimore-Washington facility to the travelling public. As an element of this marketing effort, BWI launched a \$106,000, five-week media blitz beginning January 28th and running through March 2, 1980. This phase of the BWI marketing effort utilized television advertising, supported by radio spots and print media, in the Washington market. Using television as an advertising vehicle is unique for an airport, and Maryland is confident that BWI, our airlines, and the travelling public will all ultimately benefit from this exposure.

In sum, BWI is serving the BWI market and is committed to serving this market in the future. BWI has the requisite terminal and airside capacity to handle any level of overflow traffic which may result from a policy limiting operations at Washington National. The Maryland Aviation System Plan, finalized in December of 1975 and refined yearly, fully considered the issue of air passenger limitations at

Washington National, and these findings became a principal input to the recently completed BWI Master Plan.

BWI is also fully prepared to handle any Washington National overflow traffic from an environmental perspective. Through the Maryland Environmental Noise Act of 1974, BWI is committed to a two-pronged effort to reduce the impact of aviation-related noise through the implementation of (1) a noise abatement plan and (2) off-Airport land-use restrictions to prevent future incompatible development. The BWI Noise Abatement Plan, developed in cooperation with the Federal Aviation Administration, aviation industry, and local government, attempts to minimize the noise of aircraft operations within the constraints of federal air traffic control, technical and economic feasibility, and regard for aircraft safety. The Plan, in addition to covering runway utilization and aircraft operating procedures, includes a program of periodic noise monitoring, a telephone hot-line to receive complaints, and a permanent review committee—the BWI Environmental Committee—which includes representatives of the aviation industry, federal government, and citizens who live in the vicinity of the Airport.

The second element of the environmental program, the Airport Noise Zone, is based upon current and projected aircraft operations and procedures included in the Noise Abatement Plan. Under the 1974 Environmental Noise Act and related Airport noise regulations, restrictions are placed on the establishment of land uses within the zone. This process includes a permit procedure and a Board of Airport Zoning Appeals which considers the grant of variances from these regulations on a case-by-case basis. BWI and the State of Maryland have assumed a leadership role in ensuring that the Airport continues to operate in harmony with its environment.

Turning attention to the proposed Metropolitan Washington Airports policy, let me briefly summarize the comments Maryland has previously filed with the Federal Aviation Administration. Specifically, comments were forwarded to the Federal Aviation Administration on March 14, 1980 through the A-95 Review process, and subsequent comments were submitted on Docket Number 19948 (Notice of Proposed Rulemaking), and Docket Number 19950 (Notice of Proposed Policy), appearing in the January 21, 1980 Federal Register (Vol. 45, No. 14 at 4314 and 4320, respectively).

While generally supportive of the proposed policy, the Maryland Department of Transportation was and is compelled to state strong reservations to two specific provisions: (1) The 18 million annual passenger cap at Washington National Airport and (2) the scheduling scheme which permits air carrier operations at Washington National up to a 10:30 p.m. curfew. Let me briefly summarize the basis for our reservations, and offer two remedial courses of action.

The FAA-proposed cap of 18 million annual passengers is based on the dual presumption that (1) National is the most convenient airport of the three for the majority of originating and terminating passengers and, (2) that National will retain this position in the Washington area's air transportation system indefinitely. In fact, the dominant demographic trend in the Washington region is toward increased residential development in suburban areas and the relocation of work centers to various suburban commercial locations. Recognizing that most Washington suburban areas are more conveniently served by BWI or Dulles than by Washington National, the proposed policy will work to reinforce patterns of airport usage grounded in the past demography of the region, and not in the demographic trends of the present and future.

Although the FAA attempts to justify its proposed expansion of Washington National and continued under-utilization of BWI and Dulles on the basis of convenience, the draft environmental impact statement glosses over present and near-term improvements to the BWI ground access network. The impact statement, for example, fails to adequately consider the currently available door-to-door limousine service to BWI from the Maryland/Washington suburbs and does not reference the BWI-Amtrak Station, scheduled to commence operation in the fall of 1980.

The Department further notes that the proposed policy, by triggering the master planning study for Washington National, will culminate in the expenditure of tens of millions of dollars to expand and upgrade airside, terminal, and groundside facilities to accommodate the proposed 18 million annual passenger level. Such an expansion of Washington National's passenger capacity, however, overlooks the ability of BWI and Dulles to accommodate the growth in area traffic at far less cost and no loss of convenience for the air traveler.

In sum, demographic trends and existing capacity at Dulles and BWI, combined with present and proposed ground access improvements, all interact to make the Department-proposed 16 million ceiling for National a more reasonable figure consistent with the Federal Aviation Administration's own stated goal of achieving, and I quote the FAA—"a more balanced utilization among the regional air carrier

airports . . . through a program of managed growth . . . at National" (Federal Register, Vol. 45, No. 14 at 4322). The Department-proposed 16 million ceiling would better rationalize the Washington air transportation system by providing convenient service to air travellers in a manner consistent with demographic trends, airport capacity, and ground access.

The Department's second major reservation concerns the proposed hours of operation at Washington National. The Department supports the concept of establishing within the Federal Aviation regulations limits on the hours that Washington National is open and to further limit the hours in which the certificated and commuter air carriers can schedule operations.

The Department, however, takes strong exception to the assertion that the proposed scheduling prohibition will eliminate the stacking of turbojet operations. In fact, the proposed policy only serves to reduce the number of potentially stacked aircraft while it concurrently shifts the burden from 10:00 p.m. under existing procedures to 9:30 p.m. under the proposed policy. Permitting as a matter of policy an hour "grace period" encourages airlines to commit themselves to a schedule of operations which embraces the 10:30 p.m. curfew as the effective scheduling deadline.

The Administration urges imposition of an absolute 10:00 p.m. curfew while maintaining the proposed 7:00 a.m. to 9:30 p.m. scheduling limitation (except emergencies). Assuming good faith scheduling procedures on the part of airlines, a 30 minute "grace period" should provide an adequate margin to conduct timely Washington National operations. Delays of 30 minutes or more are relatively infrequent throughout the aviation system nationwide, and BWI and Dulles can easily accommodate diversion in those rare instances where weather or equipment problems force a delay in excess of half an hour. Prudent scheduling, combined with a greater utilization of Dulles and BWI, will further mitigate potential scheduling problems precipitated by a 10:00 p.m. curfew and a 9:30 p.m. cessation of scheduling at Washington National.

In conclusion, Mr. Chairman, BWI is committed to serving the Baltimore-Washington market, and we are well-prepared to handle any level of overflow traffic which may arise from the imposition of a passenger ceiling at Washington National. The interests of all concerned parties will be best served through a more balanced utilization of the three air carrier airports serving the Washington metropolitan area. BWI stands ready, willing, and able to play a major role in achieving this more balanced utilization, while concurrently affording Washington area residents an immediate relief from aircraft noise.

Mr. ANDERSON. Please proceed.

TESTIMONY OF KARL R. SATTLER, ADMINISTRATOR, STATE AVIATION ADMINISTRATION, MARYLAND DEPARTMENT OF TRANSPORTATION, ACCOMPANIED BY NELSON K. ORMSBY, SPECIAL ASSISTANT

Mr. SATTLER. With me today is Mr. Nelson Ormsby, who is my Special Assistant at the Aviation Administration.

I will very briefly summarize my testimony.

The Maryland Aviation Administration is responsible for the development of regulation of all aviation within the State of Maryland, but is also charged with the operation and development of BWI Airport, which is one of the three major air carrier airports serving the Washington area.

Maryland bought but in 1972 and since that time we completely restored the facility, built a \$70 million terminal, rehabilitated the runways and built a new cargo complex. We have also introduced a very aggressive marketing program at the airport to designed to acquaint the airlines and the Washington traveler with the convenience of BWI to the Washington area.

We believe that both these programs have been successful. We do have capacity at the airport now and are attracting new airlines and more and more Washington residents through our facility. To support the airport's connection with Washington, we have intro-

duced over the years, and improved the ground transportation system to BWI, and now run 25 round trip limousines a day, 40 passenger buses and door-to-door service within Prince Georges County and Montgomery County.

We are also looking forward to the opening of the Amtrak station in October at the airport.

At present, the Maryland Department of Transportation is negotiating with Amtrak as to the number of trains that will be stopping there besides the trains operated by the department itself.

On the environmental side, Maryland in 1974 foresaw the problems of protecting airports and enacted the Maryland Environmental Noise Act of 1974, which precludes noncompatible development from around BWI, thereby allowing us quite a bit of breathing room and expansion into the future.

With this as background, I will briefly summarize the two points that we made in our testimony before the FAA. In our written comments on their docket on a proposed National Airport policy.

In general, we are very supportive of the policy. We applaud the FAA for taking a very dramatic step forward and we think it is an excellent first step in rationalizing the utilization of the three-area airports.

We are glad to see they recognize BWI as one of the airports. We do, however, have two reservations. The first is the proposed \$18 million cap, and the second is the 10:30 absolute curfew.

In the first instance, we believe that a 16 million passenger ceiling would be a far more reasonable figure and would be consistent with the FAA stated goal.

And I quote the FAA: "(a) More balanced utilization among the regional air carrier airports through a program of managed growth at National."

This ceiling, we believe, would encourage a more rapid use of Dulles and continue the growth trends at BWI. Both of these airports, as you know, have excess capacity at the moment.

Our second reservation concerning the 9:30 p.m. scheduling cutoff and 10:30 absolute curfew, we believe, is insufficient to bring the necessary relief to Maryland residents living under the flight paths at DCA.

We propose a 7 a.m. to 9:30 p.m. schedule limitation, but only permitting a 30-minute grace period. We believe that this suggestion would provide sufficient operating margin for normal delays without encouraging the airlines to schedule tightly against the cutoff time.

We also believe that more prudent scheduling and greater utilization of Dulles and BWI will further mitigate the potential scheduling problems.

In conclusion, BWI is committed to serving the Baltimore-Washington market, and we are prepared to handle any level of overflow traffic which may arise from the imposition of any passenger ceiling at Washington National and we believe the interests of all concerned parties will best be served through a more balanced utilization of the three-area airports.

BWI is ready and quite able to play a major role in achieving this balanced utilization, while concurrently affording Washington area residents with an immediate relief from some aircraft noise.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Sattler, for your presentation. I want to commend you on the way you people have improved the Baltimore-Washington Airport. It's an excellent job. I have been listening to some of the comments I hear from people who don't want to use BWI or Dulles, and I don't really understand it myself.

I go to California, not every week but close to it, 43 trips last year, and most of my trips are out of Dulles, but quite a few are out of BWI.

Even though it takes me longer to drive to BWI or Dulles than it does to National, we get off quicker. When we go to National, I will sit in the airport 25 minutes sometimes waiting to get a turn to fly out, and sometimes I wonder if I don't make better time by going to Dulles or BWI.

None of the direct flights go into National, so I have to go to BWI or Dulles for the nonstop flights. A lot of these can be moved out without any inconvenience to some of the people and save more time than they think they are saving today.

Your testimony suggests BWI can handle increased traffic with less airport development than would be required at National to handle the added traffic.

Do you have any data on the comparative costs of handling added traffic at National and BWI?

Mr. SATTLER. At BWI I have already put the physical plant into place. We have currently 3.9 million passengers, and a terminal capacity of 11.2, 11.5 million right now. We can expand that to 20 million annual passengers with modest capital expenditures.

Our runway capacity, including the general aviation now serving the airport, we are only at 50 percent of our capacity, so we have quite a bit of expansion. It has been my impression that National Airport, there is not a lot more you can shove into the bag basically. Any development there is going to be very costly, due to the fact that you have to rebuild an existing facility.

There is air capacity. We were fortunate we were able to be a little ahead of the power curve and develop our airport while we still had some slack in it. In order of magnitude, I wouldn't hope to speculate. Maybe \$100 million would suffice to cover the new terminal at National, but that is pure speculation.

Mr. ANDERSON. You suggest a 10 p.m. curfew at National. Do you think this would result in a shift of late night flights to BWI, and would this create a noise problem for BWI?

Mr. SATTLER. It would, I believe, shift some of the flights, not all of the flights. I think, not every flight pulled out of National as a result of any policy, will necessarily show up at BWI or Dulles. The proportion at BWI, because of the Maryland Environmental Noise Act which has tried to protect its citizens to the maximum extent possible, will not result in an adverse impact.

We can accept more flights at BWI. We have fewer people under the flight paths, and we preserve the flight paths so we can have increased utilization of the runway without significantly increasing the number of individuals that are impacted by the noise at BWI.

Mr. ANDERSON. Apart from the problems of noise at the airport and air traffic control capacity, should the Federal Government

intervene in the carriers' decisions as to the service they wish to provide at National?

Mr. SATTLER. No; I don't believe so. I think the market ought to determine it, and I think the Federal Government ought to set whatever restrictions are necessary to make National Airport a good neighbor to the community, and allow the airlines to make their own decisions as to where they fly from National Airport.

Mr. ANDERSON. What will the traveltime be for Amtrak service from Washington to BWI, and will there be stops en route and how close to the terminal will the train station be?

Mr. SATTLER. The running time is 32 to 38 minutes. The station itself is within 1.25 miles from the terminal. The airport will operate a shuttle. There will be at some point checkin facilities at the terminal or at the train station.

At present the stops are envisioned at Union Station and New Carrollton Station and on to BWI.

Other stops that would be made by the Amtrak portion of the operation as opposed to the Maryland Department of Transportation portion, I have no knowledge of at this time.

That is under negotiation between the two entities.

Mr. ANDERSON. What will the traveltime be for Amtrak service from Washington to BWI? Have you made any efforts to persuade carriers to shift service from National to BWI, and what was the carriers' reaction?

Mr. SATTLER. We have been making very strenuous efforts since approximately 1973, early 1974. In some instances we have had very good reaction from the carriers as evidenced by some of the new carriers we have at BWI, that are not at the other two Washington area airports.

Part of the thing is also the chicken and the egg. People want to fly out of National because the flights are there. The flights are there because the people want to fly out of National. Once you break into that mentality, it works very well.

We have had higher levels of service; we have picked up greater than our percentage share of the population based upon numbers of seats.

Mr. ANDERSON. Mr. Sattler, I think that completes my questions, unless there is anything you wish to add.

Thank you very much.

Mr. SATTLER. We appreciate the opportunity, thank you.

Mr. ANDERSON. The next witnesses are a panel of Washington area public officials consisting of Elizabeth Scull, chairperson, Metropolitan Washington Council of Governments, and chairperson of the County Council, Montgomery County; Charles E. Beatley, Jr., mayor of the city of Alexandria, Va.; Ellen Bozman, member, county board, Arlington County, Va.; Mr. Robert W. Foreman, representing the board of supervisors, Fairfax County, Va.; Carl Henrickson, chairman, board of supervisors, Loudoun County, Va.;

The full text of your prepared statements will appear in the record at this point.

[Statement referred to follows:]

STATEMENT BY ELIZABETH L. SCULL, CHAIRMAN OF THE BOARD, METROPOLITAN
WASHINGTON COUNCIL OF GOVERNMENTS

Mr. Chairman, I am Elizabeth L. Scull, Chairman of the Board of Directors of the Metropolitan Washington Council of Governments (COG), and I am here to present the views and position of COG on the proposed Metropolitan Washington Airport Policy of the Federal Aviation Administration (FAA). I would also request the opportunity to participate in the further discussion with the panel as a member of the Montgomery County Council.

COG is the regional organization of the area's local governments and their governing officials, plus the area members of the Maryland and Virginia Legislatures and the U.S. Senate and House of Representatives, 220 members in all.

COG is responsible for areawide comprehensive planning for the Washington Metropolitan Area, and through its transportation policy arm, the National Capital Region Transportation Planning Board, is conducting a Five-Year Continuing Air Transportation System Planning Program for the Region.

Since 1975, when a plan for "The Future of Washington's Airports" was jointly recommended by the Transportation Planning Board and our Land Use Policy Committee, COG has worked diligently to achieve two major and complementary aviation planning goals for the region. There are (1) to accelerate and ensure the continued reduction of aircraft noise impacts on our local communities, and (2) to achieve a more rational utilization of the three air carrier airports serving the Washington Metropolitan Area.

Over the past few years, we have worked cooperatively with the FAA to study and test alternate flight patterns at Washington National Airport in an attempt to alleviate severe aircraft noise impacts on communities under the current flight paths.

To date, a flight path extension along the Potomac River has been tested, and we are considering the feasibility of a "scatter pattern" flight plan. During our studies and public hearings on aircraft noise, it has become clear that the frequency of noise episodes has the most devastating impact on communities and individuals, that unless the rapid unrestrained growth of air travel of National Airport is brought under control, the citizens of this region will continue to suffer unduly and unfairly from aircraft noise.

The other related major concern of COG involves the rational utilization of the three major airports serving the area. Currently, approximately 70 percent of all air passenger travel in the region is concentrated at Washington National Airport, with the remaining 30 percent divided approximately equally between Baltimore-Washington International Airport (BWI) and Dulles International Airport (Dulles). And yet both Dulles and BWI have modern, expanded facilities that are greatly underutilized, while National continues to operate in an overcrowded and congested condition. Sound planning and common sense strongly suggest that it is time to take steps to correct this serious and gross inequity by reallocating flights to take advantage of the excess capacity at BWI and Dulles, and at the same time to reduce both congestion and aircraft noise generation at National.

COG's position on the proposed Metropolitan Washington Airport Policy is directly related to these two major objectives and concerns. More specifically, COG's position can be summarized as follows:

1. COG supports the general concept and thrust of the Proposed Policy, as revised, and the urgent need for such a policy.
2. COG urges the FAA to adopt a 14 million passenger limit at National, rather than an 18 million limit, as the most effective means of achieving the Region's major goals of accelerating and assuring the continuing reduction of airport noise impacts on our local communities, and a more rational utilization of the three air carrier airports serving the Washington Metropolitan Area, through an equitable distribution of flights above this limit to BWI and Dulles.
3. COG supports the phasing in of wide-body aircraft at National, and the adoption of a firm schedule to reduce hourly air carrier operations by 50 percent by 1985.
4. COG recommends limiting capital investment in improvements to terminal facilities and access roadways at National Airport to those which would improve the airport's operation, but would not sustain a level of activity beyond the limit finally established by FAA.
5. Finally, the FAA is urged to expedite the construction of the Dulles Airport Access Road Connector in order to enable effective management of I-66, and to promote the development of public transportation to other area airports, including rapid transit to Dulles.

Since we are aware of the position of the Air Transport Association of America and its member airlines, and they have testified at today's hearing, I would like to

conclude my remarks with several observations and comments on the airlines' role and responsibilities in this critical matter.

First, we believe that the airlines are in the strongest position to effect a more rational utilization of the three major airports by virtue of their ability to schedule service at these airports.

The airlines have taken the position that the marketplace should determine service. Yet they continue to schedule the most attractive service at National, which results in a self-fulfilling prophecy that the greatest demand is at National.

We are convinced that if some of this attractive service was reallocated to BWI and Dulles, the demand would follow. Our monitoring and forecasts of regional land development activity over the past five years clearly indicate that the air travel market, and particularly air travelers who go from home to the airport, has shifted significantly towards BWI and Dulles, and that more attractive service at these two airports would increase demand and utilization.

In this connection, we would like to emphasize that for the most part, except for selected short-haul trips, there are no viable alternatives for the air traveller in the Washington Metropolitan Area. This means that the airlines will not lose air travellers to other competitive modes by reallocating flights, since, by and large, the air traveller must use one of the three available airports.

We are puzzled by the airlines' attitude in support of continued unrestrained growth at National. In other metropolitan areas, as older, close-in airports become congested and environmentally sensitive, the airlines have supported major shifts to larger, more modern facilities in outlying locations. In the Dallas area, the major airline activity and service was shifted from Love Field to the Dallas-Fort Worth International Airport. In the Kansas City area, airline activities and services were shifted from the old Kansas City Airport to the new Mid-Continental Airport. And, in Chicago, of course, the major shift was made from old Midway Airport to O'Hare International Airport. Why can't the same logic and rationale prevail here, at least to the extent of shifting some of the heavy air traffic from National to BWI and Dulles?

We have noted that the airlines have proposed permitting a greater number of air carrier operations during those hours when the ambient noise level is high and reducing them when it is low. In examining alternate flight path concepts for National Airport to reduce aircraft noise impacts, we have learned through experience from our studies and public hearings that ambient noise levels vary greatly throughout the area, even between communities that are in close proximity to each other. Sensitivity to these variations in ambient noise levels is essential to achieving meaningful noise relief.

We have also noted that the airlines have proposed a reduction in the number of air carrier slots on Saturdays and Sundays. They propose to reduce the current 640 slots allocated for Saturdays and Sundays to 534 on Saturdays and 584 on Sundays. However, as of January 1979, only 496 slots were actually used on Saturdays, and 555 slots were actually used on Sundays. In other words, the proposal would actually provide for increases, rather than reductions, in current weekend aircraft noise levels.

Mr. Chairman, these comments and observations point to the need for the airlines to recognize the serious impacts of their operations on our local communities and to meet the citizens of the Washington Metropolitan Area half way in working to reconcile their economic objectives with our environmental concerns through a more rational and equitable distribution of air carrier activity at the three major airports serving our region.

Thank you.

STATEMENT OF CHUCK BEATLEY, MAYOR OF THE CITY OF ALEXANDRIA, VA.

Mr. Chairman and Members of the Committee, I am Chuck Beatley, the Mayor of the City of Alexandria. The Alexandria City Council asked that I represent them here today and present the City of Alexandria's views regarding FAA's proposed airport policy.

Alexandria is a modern, progressive and independent City. Old Town Alexandria dates back to 1749 and lies along the flight paths into and out of National Airport at a point where the City residents are subjected to maximum aircraft noise. In fact, because of Alexandria's close proximity to National Airport, FAA's monthly aircraft noise monitoring report identified Alexandria as the most heavily impacted of all communities within the Metropolitan Washington Area.

Noise is more than just annoyance. In addition to demonstrated evidence on hearing loss, noise can be a factor in serious health problems. Noise may produce hypertension, faster heart rates and increased adrenaline and may contribute to

heart and circulatory disease. Noise interferes with conversation, social interaction and hampers work efficiency. Aircraft in and out of National Airport produces noise at such levels which seriously affect the health and social well being of residents.

In addition to noise pollution, the Metropolitan area, which includes all of National Airport, is in a non-attainment air pollution area caused chiefly by the pollutant ozone. Hydrocarbons emitted by the automobile are the primary and major factor in producing ozone. Because metropolitan Washington is a non-attainment pollution area, the local governments had to develop transportation strategies to offset the increase in hydrocarbons. Just recently, the governing bodies of Maryland, the District of Columbia and the Commonwealth of Virginia were required by the Federal Government to pass legislation directed at reducing hydrocarbons. Beginning January 1, 1982, area residents owning automobiles are now required, at individual expense, to have each of these vehicles inspected for emissions. To this pollution non-attainment environment, where citizens are taking all available measures to reduce pollution and the Federal Government is threatening to impose sanctions, the FAA is proposing an increase in airport passenger activity which increases the automobile activity and in turn increases the hydrocarbons. Unfortunately, for the residents of the area, this will cause an increase in air pollution, an additional health hazard.

National Airport is not only the source of environmental problems but, in addition, there exist some serious internal operational problems. National Airport was designed in 1941 as a DC 3 era airport. The runways, taxiways, hangars and center core of the terminal building are virtually the same as in 1941. Today, with modern advances in technology and aircraft design, the airport, even in good weather and under excellent Visual Flight (VFR) Conditions, is basically a one (1) runway operation. Under Instrument Flight Rules (IFR) Conditions there can create operational problems. IFR conditions are complicated at times by cross-wind and downwind takeoffs and landings and, further complicated by wind shear meteorological conditions which require absolute precision for aircraft approaches. The occasional excursion from precisely being "on the numbers" illustrates the advantage of a little extra runway availability for undershoot or over-run. Operations should not be high pressure . . . should be conservative.

Although current flying conditions at National may at times be marginal, Alexandria does not support the elimination of National Airport, but does emphatically support the proposition that future airport growth within the Metropolitan Washington Area be directed from National to Dulles International Airport.

Dulles, a 10,000 acre installation, provides and has available multiple runways, permitting multiple directions for landings and take-offs . . . multiple instrument landing facilities that allow simultaneous multiple operations . . . thus allowing flight operations in all types of peak demands, 24 hours a day, in all types of weather conditions.

I do not know of another airport in the nation's top 100 that attempts to do so much with virtually only one runway and with a single ILS in a single direction—as National does.

I am a retired United pilot. From 1942 to 1966, I was based out of National Airport, flying DC-3's, DC-4's and later Viscounts. It was with a sigh of relief that I graduated from the frenzied traffic patterns of National to the totally modern airport of Dulles flying DC-8's. I would never have believed in 1964 when Dulles opened for service, that 16 years later National would have continued massive growth and that Dulles would only be handling 3½ million passengers—or less than ¼th of National's 15 million—or that FAA's newly proposed annual growth of 3,000,000 for National virtually equals Dulles' present total usage. Dulles is truly the most modern and complete of the nation's airports. It's expansion capability is virtually unlimited. The planned-for growth, long delayed, is still awaiting implementation.

Since 1977, the City Council has presented its position on the Metropolitan Washington National Airport Policy, and that position is as valid today as it was three years ago. While FAA has implemented some of the City's recommendations, they have not accepted a number of City Council's proposed actions. The City Council reaffirms its past position and strongly requests:

1. That FAA take action to limit growth to current levels by placing a 15 million annual passenger capacity limit at National Airport. FAA indicates in its 1980 Supplement that a 16 million passenger cap results in a reduction from the current scheduled 40 slots to 22 slots per hour. A 15 million cap would provide a similar slot reduction.
2. That future growth in excess of the current level of 15 million passengers be directed to Dulles Airport which has the capacity and the equipment to satisfy the

increased passenger load and the capability for all types of aircraft to takeoff and land under all weather conditions.

3. That action be taken by FAA to require aircraft to fly a course which approximates river center at least past the beltway.

4. That pilots of all scheduled and non-scheduled aircraft using National Airport utilize all practical noise abatement procedures in the operation of the aircraft.

5. That the number of scheduled slots at National between the hours of 9 p.m. and 9:30 p.m. be reduced to 18 with all arrivals and departures completed by 10:30 p.m. That no operations other than emergencies be authorized between the hours of 10:30 p.m. and 7:00 a.m.

6. That no scheduled trips be allowed to leave from National Airport that go beyond the 650 miles limit.

7. That wide body aircraft be allowed at National Airport provided that compensating trip reductions be made to keep maximum annual passengers to current levels. In fact, National's single runway operation will require several minutes of extra spacing of the flight immediately following the "wide-body heavy" because of the wing vortex problem that FAA recognizes in its operations policies. This obviously will result in fewer flights per hour . . . this we favor.

8. That FAA seriously consider promoting the development of public transportation to Dulles—either by extension of Metrorail from the future Vienna station to Dulles—or at least by very frequent Metrobus connections to the future Metrorail station. Senator Spong of Virginia sponsored a bill in 1970 to study the feasibility of extending Metrorail to Dulles. \$250,000 was spent on the study. It is gathering dust.

In closing, I want to reiterate that Alexandria does not want to harm National Airport. We only want FAA to adopt a rational long range plan for the airports of our Nation's Capital—then stick to it. That objective should be to make Dulles our No. 1 airport—the one that takes all future growth—treat National as our No. 2 airport with no more growth beyond current levels. Let's not attempt to weasel more add-ons to National by various schemes. To do so will lead to a dead-end canyon—one that will end disastrously by stifling the normal growth that would come naturally to scheduled aviation in our Nation's Capital.

Mr. Chairman and Members of the Committee, this completes the City of Alexandria's position in regard to National Airport.

STATEMENT BY ELLEN N. BOZMAN, MEMBER, ARLINGTON COUNTY BOARD

I am pleased to have this opportunity today to appear before you to present Arlington County's position on the Federal Aviation Administration's Proposed Washington Metropolitan Airport Policy.

Over the years, Arlington County's objective has been to have aircraft traffic diverted from National Airport to Dulles Airport and Baltimore Washington International Airport. In 1979, National Airport accommodated sixty-seven percent of the air passengers in the region. Arlington County has consistently sought operational policies that would provide more balance in the quantity of aircraft traffic at the region's airports.

In March of this year, the Arlington County Board endorsed all of the elements of the FAA's Proposed Policy for operation of the Metropolitan Washington Airports. The FAA's proposal to manage the growth of aircraft traffic at National Airport is in conformance with Arlington's objectives. The immediate establishment of an eighteen million annual passenger limit and the gradual reduction of hourly air carrier scheduled slots are both endorsed by the Arlington County Board. We are pleased with the FAA's proposal to rollback National's scheduling hours to 9:30 pm and to close the airport by 10:30 p.m. The FAA's proposal to permit two and three engine widebody aircraft at National and to increase the commuter carrier slots has also been approved by the County Board.

The FAA is considering two options for a nonstop service perimeter at National. The County Board endorsed the first option, which is to retain the existing 650 mile nonstop perimeter with the existing "grandfather" exemptions for seven cities.

In closing, I would like to point out that the local governments of this region are united in their support for the diversion of aircraft traffic at National Airport. This type of regional solidarity occurs on very few issues, and is therefore quite significant.

The FAA proposed policy begins to close the gap which has existed between federal policy and local environmental needs. National transportation needs and local governmental needs can successfully be satisfied given a truly cooperative effort by the more powerful of the parties—the FAA. Therefore, I urge the Committee to exert all your influence with the FAA to ensure a continuing dialogue

between the FAA in its unique role as an airport operator and the local jurisdictions in the Washington Metropolitan area.

STATEMENT OF JOHN F. HERRITY, CHAIRMAN, FAIRFAX COUNTY BOARD OF SUPERVISORS, PRESENTED BY ROBERT W. FOREMAN

I am John F. Herrity, Chairman of the Board of Supervisors of Fairfax County, Virginia. I am here to present my views and the position of the Fairfax County Board of Supervisors on the proposed use of Washington National Airport.

First, I would like to thank this Subcommittee for scheduling this hearing and for the cooperation of your staff. For many years the citizens and the governments of this area have wrestled with the problems of Washington National Airport. I am pleased the Federal government is taking steps to replace the present informal procedures with an organized plan which recognizes a broad range of regional interests. This hearing is a step toward a long overdue solution.

I think most elements of the Department of Transportation's plan should be supported. The policy objectives recognize the need to consider Washington National Airport as an element in overall transportation needs. Also, the objectives relate the role of the Airport with the needs and expectations of the community, and they link the planning and funding of capital improvements to the role of the Airport. This type of evaluation, planning and implementation is necessary.

I am concerned with other elements of the plan. The objectives speak to fuller utilization of the airports and to growth of the airports. Fairfax County does not border the Airport, but we are affected by the noise of flight operations. This is a significant problem to many of the 145,000 County residents who live in the McLean and Mt. Vernon Planning Districts. I think it is good that the Department proposes a limitation on total passengers per year, but I think the 18 million passenger limit is too high. I think the proposed reductions in flight numbers and hours of operation are good, but they do not go far enough.

On April 7, 1980, the Board of Supervisors adopted seven specific recommendations on the future use of Washington National Airport. We think these recommendations, if adopted, will improve air traffic safety and improve the present noise pollution problem. Specifically, Fairfax County recommends:

(1) The Federal Aviation Administration should adopt a clear policy that will reduce aviation traffic at Washington National Airport. This will serve to reduce present noise and air pollution.

(2) In order to accomplish this goal as quickly as possible, wide bodied aircraft should be phased in to replace narrow bodied aircraft on a one for two ratio as quickly as safety considerations will permit. The target of this transition should be a 50 percent reduction in air carrier flights by 1985.

(3) During the transition period and until the number of flights decreases, a mandatory limit of 16 million passengers annually should be imposed on Washington National Airport. Numbers in excess of 16 million should be scheduled equitably between Dulles International Airport and Baltimore-Washington International Airport.

(4) A strategy should be developed to encourage alternate types of short haul transportation. Passengers traveling in the northeast corridor should be encouraged to use buses and railroads.

(5) With a passenger limitation of 16 million passengers per year, capital improvements can be directed towards modernizing existing terminal facilities, access roadways and operation safety improvements. There will be no need to provide facilities for expanded operational use.

(6) The Federal Aviation Administration (FAA) is currently encouraging an innovative and aggressive noise abatement program at all airports throughout the nation. This is commendable and Washington National Airport and Dulles International Airport should be used by the FAA as noise abatement models for others to follow.

(7) Except for emergency situations, the scheduled hours of operation at Washington National Airport should be from 7 a.m. to 9 p.m.

Thank you for considering Fairfax County's position on this matter. We think our recommendations will result in more efficient use of the region's airports and reduce a serious noise problem.

STATEMENT OF CARL HENRICKSON, CHAIRMAN, LOUDOUN COUNTY BOARD OF SUPERVISORS

At a regular meeting of the Board of Supervisors of Loudoun County, Virginia, held in the Board of Supervisor's Meeting Room, 18 North King Street, Leesburg, Virginia on Monday, March 17, 1980 at 1 p.m., those present were: Carl F. Henrickson, Chairman, James F. Brownell, Vice Chairman, Frank Raffo, Gerry Gardner, John Milton, Andrew R. Bird III, Thomas S. Dodson, and Travis L. Sample.

Mr. Bird moved:

Whereas the Loudoun County Board of Supervisors is concerned over the recent loss of air service to Dulles International Airport; and

Whereas the Board agrees with the Federal Aviation Administration that Dulles International Airport should serve all types of transportation needs and that its facilities be improved as need to fulfill this role; and

Whereas the Board understands that the implementation of a Metropolitan Washington Airports policy is a prerequisite to the further development of Dulles International Airport's facilities: Now, therefore, let it be

Resolved, That the Loudoun County Board of Supervisors endorses the Federal Aviation Administration's proposed Metropolitan Washington Airports policy as further defined by the following provisions:

(1) That service to Dulles International be promoted to further utilize this facility and that public transportation to the Airport be improved and promoted.

(2) That there be an annual total passenger limit of 18,000,000, or equal to the annual number of passengers in 1990, at Washington National Airport, whichever comes first.

(3) That the total number of operating slots per hour at National be no more than 60 which total should consist of 36 scheduled air carrier, 12 general aviation and 12 commuter slots.

(4) That the operating hours at National be modified and the scheduling hours be reduced to allow operations between 7:00 a.m. until 9:30 p.m. with an absolute curfew between 10:30 p.m. and 7:00 a.m. except for emergencies.

(5) That the lifting of the prohibition against using two- and three-engine wide-bodied aircraft at National be carefully monitored by the Director of Metropolitan Airports not only in terms of the adequacy of the airport's facilities to accommodate this aircraft but also in their use as a substitute for non-stop service from outside the present 650-mile perimeter.

(6) That the present 650-mile non-stop service perimeter at National be maintained and, furthermore, that service to the seven "grandfather" cities outside this perimeter be eliminated by 1985.

Voting on the motion: Supervisors Bird, Henrickson, Brownell, Raffo, Gardner, Milton, Dodson, and Sample—Yes; None—No.

PHILIP A. BOLEN,
County Administrator.

STATEMENT OF COUNCILMAN JERRY A. MOORE, JR., COUNCIL OF THE DISTRICT OF COLUMBIA

Good morning, Mr. Chairman and members of the Committee. I am Councilman Jerry A. Moore, Jr., an At-Large member of the Council of the District of Columbia. I am pleased to have this opportunity to address the Committee on the Department of Transportation's proposed policy for the future operation of the Washington National and Dulles International Airports. I am speaking on behalf of the District government and in particular, as Chairman of the Council's Committee on Transportation and Environmental Affairs.

The Federal Aviation Administration's (FAA) Policy for Washington National and Dulles International Airports has generated considerable interest among District residents, and many of our citizen associations have approved resolutions commenting on it. The Mayor also has submitted comments on the Supplement to the Draft Environmental Impact Statement (EIS). (A copy of these comments is attached for the record.) While the Council has not taken any official action on this proposal, it has addressed some of the issues raised in the Draft EIS in the past.

I believe that the FAA's 1980 Supplement to the 1978 Draft EIS is an improvement over the earlier document. Unfortunately, I still do not believe that it goes far enough in addressing the concerns previously raised by the District and the region. I hope it will be possible to put a stop to all the talk and planning and in the near future to develop a strong policy for these airports which will benefit the Metropolitan Washington region which is served by the airports.

The FAA states that the goal of its airport policy is to achieve a more "balanced utilization among the regional air carrier airports." I wholeheartedly support this goal. The proposed policy, however, does not go far enough toward meeting this goal. For National Airport to handle 54 percent of the total aviation market in 1985 is not a "balanced utilization" of the region's airports. The proposed ceiling of 18 million passengers is far too high. It will cause the other airports to be underutilized and will have an adverse impact on the residents of Maryland, Virginia and the District. The City's official position is to recommend that a ceiling of 16 million annual passengers be established at National. I would also recommend that the FAA continue its efforts to further reduce this number by directing additional air traffic to Dulles and the Baltimore-Washington International Airport (BWI).

The Council held a public hearing in May of 1977 on the FAA's then proposed alternative flight patterns for National. At that hearing District residents made it very clear that they supported a redirection in the number of flights permitted at National and a rerouting of planes to Dulles and BWI. The Council approved a resolution in June of 1977 which supported "an immediate rerouting of some planes from Washington National Airport to either Dulles International Airport or Baltimore-Washington International, with a continued yearly division of additional planes." This is just as important today as it was then.

The diversion of planes to Dulles or BWI will impact passengers currently using National. To lessen any inconvenience caused by the change I believe it is important that the Department of Transportation improve access to the other airports. This is particularly important for Dulles. As a confirmed believer in our Metrorail system I support the extension of Metro to Dulles. This idea has been studied in the past and I believe it should be reconsidered and supported. I would like to add here that if FAA is going to continue using National then the connection between the airport and the Metro station must be improved. Many air passengers already use Metro and this number would significantly increase if the access to the station were improved.

The proposed reduction in the number of air carrier operations per hour is a step in the right direction. However, in conjunction with our goal of fewer passengers at National, the District urges FAA to consider further reducing the number of slots.

The District supports the proposed reduction in the hours the airport will be open. Closing National at 10:30 p.m. will reduce the adverse noise impact during the hours when people are trying to sleep. I also urge the FAA to work with the airlines to spread out the 18 operations which are to be permitted between 9:00 and 9:30 p.m. If they are all 'bunched' at 9:30, as happens now, the scheduling change will have less of an impact. Consideration of a further reduction of hours on weekends could have additional benefits.

The District government is well aware of the beauty of the city, particularly of its many parks and open spaces. A reduction in noise levels from aircraft would increase the enjoyment of these parks. The once popular Watergate concerts had to be dropped in part because of airplane noise. Closing the airport earlier on Saturdays might permit these or similar concerts to be revived.

In an effort to reduce the number of planes using the airport and the noise levels of these planes, the City supports permitting the use of widebody aircraft. It is important however, that the use of these planes be tied to a reduction in total operations.

The number of passengers and planes using National Airport has a significant impact on the quality of life for many residents in the Metropolitan Washington area. For the region to receive any real benefits from a new policy for National and Dulles, the policy must call for a significant reduction in the use of National Airport. I hope this Committee will support the region in its efforts to have FAA adopt such a policy.

Again, I want to thank you for holding these hearings and for providing me with the opportunity to address the Committee.

GOVERNMENT OF THE DISTRICT OF COLUMBIA,
ASSISTANT CITY ADMINISTRATOR FOR
PLANNING AND DEVELOPMENT,
Washington, D.C., April 17, 1980.

Mr. JAMES A. WILDING,
Director, Metropolitan Washington Airports, Environmental Policy Section, Washington National Airport, Hangar 9, Washington, D.C.

DEAR MR. WILDING: I am pleased to submit the District of Columbia's comments on the January, 1980 Supplement to the Draft Environmental Impact Statement regarding the Metropolitan Washington Airports Policy. Accordingly, I am enclosing

comments from two D.C. agencies: The Office of Planning and Development (A restructured and expanded version of the Municipal Planning Office) and the Department of Transportation.

I would hope these comments are viewed as sufficiently important to be considered in the final Environmental Impact Statement.

We welcome further discussion regarding our comments. Should this be desired, please contact me at 727-6366.

Sincerely,

GORDON M. RAPIER,
Special Assistant.

OFFICE OF THE CITY ADMINISTRATOR,
ASSISTANT CITY ADMINISTRATOR FOR
PLANNING AND DEVELOPMENT,
Washington, D.C., April 16, 1980.

Memorandum To: Gordon Rapier, Special Assistant to the Assistant City Administrator for Planning and Development.

From: John J. Protopappas, Transportation Planning Specialist.

Subject: Draft Environmental Impact Statement on Metropolitan Washington Airport Policy.

In January of this year the US-DOT issued a supplement to their Draft Environmental Impact Statement (DEIS) of March 1978. The original DEIS had 32 possible airport policy options. Based on the comments they received on the 1978 draft, the FAA further refined the policy into four (4) possible courses of action, one of which is the FAA's preferred Proposed Policy. They are as follows: Restricted Growth, Expanded Growth, No Policy Change, and Proposed Policy.

Recommended position of OPD

Based on a transportation position, I recommend we endorse DOT's Proposed Policy. This policy allows for controlled growth and management of the airport over the next ten (10) years. It will allow for more modern facilities to be built at National, a reduction in air and noise pollution, and it would allow for an increase in commuter airline service. These measures would maintain the character of National Airport as a mid-range air facility and more evenly distribute air traffic to the other main airports, Dulles and BWI.

Specifically, I recommend the following policy:

Set limit on growth at National Airport at 16 to 18 million.

Give FAA authority to allow wide body jets to land at National.

Reduce number of carrier flights (slots) into airport from current 42 to 36, increase number of commuter flights from 8 to 12 per hour.

Change non-stop flying limit from 650 to 1,000 miles.

However, it should be noted that this recommended policy does not take into consideration the economic impact such growth limitations will have on the city. The economic concerns that arise from the FAA Proposed Policy are outlined below and should be directed to the FAA when we comment on the DEIS.

ISSUES

Economic impact: Questions and concerns regarding National Airport

National Airport is located in Virginia across the river from Washington, D.C. and because of its location most of the direct benefits of the airport accrue to Virginia. Only 8 percent of the employees at National are Washingtonians. However, there are spinoff benefits to the city and its residents as well as costs inflicted on some areas of the city. An analysis of the proposed policy to limit the growth of the airport must take three things into account: benefits (direct and indirect), costs, and the availability of substitutes. This last item suggests more than a simple cost benefit analysis is required since the costs and benefits must be recast to examine the impact of diverting growth to Dulles and BWI. The FAA's DEIS does not address these issues sufficiently from the standpoint of the District of Columbia and its economy. There are too many unanswered questions. I will briefly outline below a simple analysis of the impact of the facility on Washington and some questions which must be answered if the proposal is to be adequately evaluated.

What are the benefits of National Airport to Washington's businesses and visitors? The proximity of the airport to downtown Washington offers a time saving to the businesses and visitors to the city. What will be the total amount of lost time to those who find themselves in need of additional time for travel to and from the

airport? How will this affect those Washington businesses which are highly dependent on travel from National? What is the value of the lost time? These queries require answers so that the benefit of diverting flights from the airport may be compared to the costs to the businesses and visitors to our city.

How does National Airport benefit Washington's economic development?

We believe that the proximity of National Airport to the city, and downtown in particular, is a positive factor for locating a business or office in the city. How will a reduction in air traffic growth affect future development? How important is the proximity of the airport to business which might consider locating downtown? Will some kinds of business tend to locate elsewhere? If so, where? How will the District suffer from the movement of the development of industries directly related to the airport? Will there be a loss to the District of this kind resulting from the proposed policy?

What are the airport's tax revenue benefits to Washington?

To some extent the location of the airport should encourage travelers to visit the city even if their destination is outside the city boundaries. Will the diversion of traffic cause a decrease in this kind of visitation to Washington? Some travelers may stay in the city's hotels because of the proximity to the airport and, therefore, pay the hotel tax and tend to spend more in the city in general contributing retail sales taxes to the city. How will the change in the airport's growth alter the pattern of hotel use in the region? Will there be a decrease in the propensity of travelers to stay in the city if their flights come and go from Dulles and BWI? What will be the tax revenue impact of such a change?

What are the costs of National Airport?

Any answers to the questions raised about benefits must be balanced against the savings due to decreased air and noise pollution. A cost benefit analysis must be performed to evaluate this relationship. Is the shifting of costs from some of the city's neighborhoods (Georgetown, Southwest, Foxhall Road, etc.) onto the travelers to and from Washington in the city's overall interest?

The answers to these questions are needed for an intelligent decision on the proposed policy.

CONSTRAINTS

For a change in policy concerning the volume of traffic at National Airport to be in the interest of the District of Columbia, a balance must be found in the trade-off between the environmental costs. In the form of noise pollution and the economic benefits of the facility's location, policy must be constructed within these constraints and according to a measurement which identifies the point at which benefits are maximized without creating disproportionate costs.

From an environmental standpoint, any policy which limits growth at National Airport and/or allows wide-body jets to land will be a step in the right direction.

From this standpoint, it is recommended that an interim policy of no growth beyond 16 million passengers per year until an adequate FAA analysis is done regarding the economic impact the proposed policies will have on the District. This analysis may also be accomplished by a pending COG study on the economic impact of the National Airport on the region.

TESTIMONY OF A PANEL OF WASHINGTON AREA PUBLIC OFFICIALS CONSISTING OF ELIZABETH SCULL, CHAIRPERSON, METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS, AND CHAIRPERSON OF THE COUNTY COUNCIL, MONTGOMERY COUNTY; CHARLES E. BEATLEY, JR., MAYOR OF THE CITY OF ALEXANDRIA, VA.; ELLEN BOZMAN, MEMBER, COUNTY BOARD, ARLINGTON COUNTY, VA.; ROBERT W. FOREMAN, REPRESENTING THE BOARD OF SUPERVISORS, FAIRFAX COUNTY, VA.; CARL HENRICKSON, CHAIRMAN, BOARD OF SUPERVISORS, LOUDOUN COUNTY, VA.

Mr. ANDERSON. Please proceed.

Mr. HENRICKSON. I am Carl Henrickson with the Loudoun County Board of Supervisors, and I serve as that body's chairman.

My colleagues who are expecting to be here are also at a Council of Governments Board of Directors meeting, and they are dealing with the FAA Policy on National Airport and Dulles Airport.

I would like to let the next group appear and delay this group so that they can have the opportunity to get over here, and I will make an effort to notify them that we are next on the agenda, if that is acceptable.

Mr. ANDERSON. Does that meet with Mr. Foreman's and Mr. Beatley's approval to delay? Is it all right for you to delay?

Mr. BEATLEY. I am not sure all of us can do that.

Mr. HENRICKSON. I am more than willing to proceed.

Mr. BEATLEY. I have my vice mayor here from Alexandria, and I don't believe we are going to be able to spend the whole day on this, so I am wondering whether, unless you have something that is fairly close, are there other people involved in the panel that will show later this afternoon?

Mr. ANDERSON. Those who wish to make your appearance now make it and we will do that.

Mr. BEATLEY. Do you have my statement, Mr. Chairman? I didn't hear you take note of that.

Mr. ANDERSON. Yes; it has been entered into the record.

Mr. Beatley, you may proceed.

Mr. BEATLEY. I will try to hit the points that are really not in the statement.

Of course, you all know Alexandria, living close by, and we are an old historic city and we are right on the flight path. We have through the years I served, I am in my fourth term as mayor, my first term started back in 1967.

I am also a retired airline pilot and I fly continuously and started flying into National Airport back in 1942.

I flew continuously for 29 years and went out to Dulles. Frankly, it was quite a pleasant experience going out and flying out of Dulles.

I guess I have to say that noise, of course, noise pollution is the thing that strikes people as the most important, and that seems to be what most of the testimony is about.

I do think, however, we all have an interest in the scheduled air transportation system in our area, and not many people have touched upon this, but there is not a large metropolitan area in the country that I know of that does not have a meaningful transportation, air transportation policy with multiple airports where necessary.

In the case of this airport National Airport has just grown, as we know. It was started in 1941 and I would say that there is very little difference in National Airport today as there was when I started in 1942. The principal runway is the north-south runway 6,870 feet long. There are two other runways that are lesser length that are not really operable on jet equipment.

You virtually have the same taxiways and almost every hangar that was on that field was there in 1942. There has not been room for expansion. It does not have room for multiple runways, one instrument landing system, one direction, not each direction, and it is an extremely marginal airport from the standpoint of operations of scheduled air carriers.

It has survived because of its location, and its location obviously is very appealing to many people.

I will have to say that of my constituents in Alexandria there are some people that are very much concerned that want to keep the airport, have it expanded, a few of them would.

Most of the people, though, in Alexandria like the convenience of National Airport, but at the same time they recognize the growth should not be tried to be pressed into National Airport.

Last January I was invited to address the Chamber of Commerce of Alexandria, and I assumed that the chamber people would be pretty much proairport, for expansion and so forth. At the end of my speech I got to the subject of National Airport, and I said I am going to touch on National Airport, and I am sure that there are some people that will disagree with what I have to say, but here is what I have to say, and I am saying the same thing today.

This airport is not the facility that should be the Washington metropolitan area's gateway airport. It does not have the capability of being that, and I recited the limitations. When I got done I received virtually a standing ovation, which surprised a lot of people in the room as well as myself.

I did not realize, I had letters and comments from chamber people since telling me that they agreed with me completely, that there is no long-range future for National Airport. In fact, there is no other major metropolitan area that has an airport that operates this densely, that only has this very, very limited facility, and virtually no opportunity for expansion.

In fact, airline flying out scheduling air travel has been rationed out of National Airport for the last 15 years or so, ever since you had slot control and, as a result, the air transportation business in the Washington metropolitan area has been atrophied, stunted, and not properly developed because the marketplace has never really had a chance to have a really great facility.

You cannot go to, I can't think of another city in the United States that I have flown into, and I have flown into most all of them, I finished my flying and started with Pennsylvania Central, which became Capital Airlines, and finished out with United Airlines, and in my 35 years of airline flying, I have literally landed at every major airport in the United States and this airport is not the gateway airport for this great community we live in, so I think what I am saying to you is that we should be looking to the curfew.

Congressman Fisher and Congressman Harris stated it correctly. None of us wants to eliminate this airport. What we want to do is hold it where it does not mislead people and take the growth and send it in the proper directions, and there is a way of doing it.

In fact, former Senator Spong back in 1970 got \$250,000 appropriated through a Senate bill and they did study an extension of the Metro system from the Vienna station on out to Dulles, a feasibility study.

It has been gathering dust ever since. Most people have forgotten all about it. An extension of public transportation to Dulles and probably advance transportation to BWI would be very helpful and become the great equalizer and would probably make Dulles even more appealing than it is now.

I, as a passenger, do not fly from National, and I use my airline pass frequently. I just got back yesterday from the U.S. Conference of Mayors from Seattle, but I purposely schedule myself into Dulles, even though I live in Alexandria, because I feel much more relaxed about what you have out there.

The small additional amount of time is so much less of a burden than trying to fight my way in and out of National. The most I can do at National is have somebody drop me off out there.

What I am saying is the airport of the future for this area is not National. National should well serve, though, as a part of the airport picture. Congressman Ertel suggested that commuter activity was in order, and I agree.

I think in the short-range and commuter flights are really what the future of this airport is, and I don't propose that we should cut anything out of what we have now but I do say we should make the growing the place it should go, which is to a modern airport.

Now, I don't know what else I can say except that there are really big operational problems out there that most of you are not aware of.

For example, when you have a heavy bodied airplane, and anything over 300,000 pounds is considered a heavy airplane, you have what we call a wing vortex problem, and that requires special treatment. At an airport such as Dulles or BWI, O'Hare, or wherever, Cleveland, wherever, these airplanes are given very special treatment.

All DC-10's, DC-11's and 747's come in this category, and a pilot, when he enters the traffic patterns at Dulles, is required by law to identify his airplane as a heavy, if it is over 300,000 pounds, and the reason is so the tower will be aware of a possibility of what we call a wingtip vortex problem.

As he lands and slows up, that means that another airplane can't follow him very soon thereafter. You have to let the runway cool off, if you will, a minute or two and you can't have the one airplane every 60 seconds that you do have around National.

I am sure they are preparing for that, but there are operational problems here where you really do need more than one runway. At an airport such as Dulles, they will have one landing on another runway, and another taking off, and this vortex problem is not there because of the availability of other runways.

Now, I guess that is about all I can say, other than we in Alexandria really are looking forward and we are willing to take our share of the present noise problems, but we are absolutely opposed to taking more and more and having people be misled and pour concrete in office buildings and whatever predicated on the assumption that, for example, the National Airport is expandable.

Mr. ANDERSON. Thank you, Mr. Mayor.

I would hope you can stay for a minute while we have Mr. Foreman from Mr. Herrity's office, so I can ask you both the same questions.

Mr. Foreman, you are going to present Mr. Herrity's presentation; is that right?

Mr. FOREMAN. That is correct, sir. [Reading.]

I am Jack Herrity, chairman of the Board of Supervisors of Fairfax County, Va.

I am here to present my views and the position of the Fairfax County Board of Supervisors on the proposed use of Washington National Airport.

First, I would like to thank this subcommittee for scheduling this hearing and for the cooperation of your staff.

For many years the citizens and the governments of this area have wrestled with the problems of Washington National Airport. I am pleased the Federal Government is taking steps to replace the present informal procedures with an organized plan which recognizes a broad range of regional interests. This hearing is a step toward a long overdue solution.

I think most elements of the Department of Transportation's plan should be supported. The policy objectives recognize the need to consider Washington National Airport as an element in overall transportation needs.

Also, the objectives relate the role of the airport with the needs and expectations of the community, and they link the planning and funding of capital improvements to the role of the airport. This type of evaluation, planning, and implementation is necessary.

I am concerned with other elements of the plan. The objectives speak to fuller utilization of the airports and to growth of the airports. Fairfax County does not border the airport, but we are affected by the noise of flights operations.

This is a significant problem to many of the 145,000 county residents who live in the McLean and Mt. Vernon Planning Districts. I think it is good that the Department proposes a limitation on total passengers per year, but I think the 18 million passenger limit is too high. I think the proposed reductions in flight numbers and hours of operation are good, but they do not go far enough.

On April 7, 1980, the board of supervisors adopted seven specific recommendations on the future use of Washington National Airport. We think these recommendations, if adopted, will improve air traffic safety and improve the present noise pollution problem. Specifically, Fairfax County recommends:

One, the Federal Aviation Administration should adopt a clear policy that will reduce aviation traffic at Washington National Airport. This will serve to reduce present noise and air pollution.

Two, in order to accomplish this goal as quickly as possible, wide bodied aircraft should be phased in to replace narrow bodied aircraft on a 1 for 2 ratio as quickly as safety considerations will permit. The target of this transition should be a 50-percent reduction in air carrier flights by 1985.

Three, during the transition period and until the number of flights decreases, a mandatory limit of 16 million passengers annually should be imposed on Washington National Airport. Numbers in excess of 16 million should be scheduled equitably between Dulles International Airport and Baltimore-Washington International Airport.

Four, a strategy should be developed to encourage alternate types of short-haul transportation. Passengers traveling in the Northeast corridor should be encouraged to use buses and railroads.

Five, with a passenger limitation of 16 million passengers per year, capital improvements can be directed toward modernizing

existing terminal facilities, access roadways, and operation safety improvements. There will be no need to provide facilities for expanded operational use.

Six, the Federal Aviation Administration is currently encouraging an innovative and aggressive noise abatement program at all airports throughout the Nation. This is commendable and Washington National Airport and Dulles International Airport should be used by the FAA as noise abatement models for others to follow.

Seven, except for emergency situations, the scheduled hours of operation at Washington National Airport should be from 7 a.m. to 9 p.m.

Thank you for considering Fairfax County's position on this matter. We think our recommendations will result in more efficient use of the region's airports and reduce a serious noise problem.

Mr. ANDERSON. Thank you very much. I have a series of questions that I will present to either or both of you, however you want to handle them.

The first question, do either of you have concerns with the division of traffic between area airports apart from the noise which results from extensive operations at National?

Mr. BEATLEY. Concerns with the division of traffic? Is that in reference to commuters versus heavy airplanes, and so forth?

Mr. ANDERSON. Not necessarily that. One of the motives apparently is to make both BWI and Dulles—

Mr. BEATLEY. Now I see what you mean.

Mr. ANDERSON [continuing]. Used to an extent they are not being used today.

Mr. BEATLEY. No; I think I would have to say the marketplace would probably determine which of the various competing airports would receive the overage. The one point that I want to make and I notice has been made is the growth cannot be placed at National Airport, and since it cannot be placed there, then you should be making plans for sending it somewhere else, and it can be done. The airlines, the FAA, and even the Federal Congress can in its subtle ways focus on how you do this, but I think the marketplace should determine that. If BWI turns out to be the best, then that is just Dulles' tough luck. If Dulles is the best, then the business naturally goes there; well, that is just BWI's poor luck.

What happens, though, and not many people realize this, is that an airport, if you were in a free marketplace, and you have say three airports, the airports themselves sort of by the freedom of choice, and it has not been a freedom of choice in the case of National, in spite of what has been said, the marketplace will sort of determine the functional characteristics of the kinds of flying. For example, in New York, LaGuardia has become the commuter airport. It was the only airport at one time. Kennedy has become the overseas and the longer range one, and the place has adjusted to it.

In the case of National, though, there has been a constant effort to keep it a long-range airport, and attempts on the thousand-mile range indicate that, and quite frankly it has not been allowed to develop in the marketplace.

Now what happens in a large metropolitan area is that one airport tends to become the dominant airport after a period of time, and had this been allowed to take place in the Washington metropolitan area, I think that you would probably have found that Dulles would have become more dominant than it has, and there is nothing succeeds like success.

I remember very distinctly what happened in Chicago when I flew into Midway in three different terminals, and it took an engineers' strike to close all the airlines down, before they actually moved into O'Hare. O'Hare stood there idle for 2 years after it was completed, and the airlines would not move because I think they had increased landing fees and other reasons for not going, and one at a time airlines could not go, they had to all be done at once or it just would not work. Well, the strike closed down Midway completely for 3 weeks, and the week before at the end of that time the airlines got together and decided they would move to O'Hare, and they did. Unfortunately, they did not leave anything for Midway. Midway was zero for a long time, and it never has caught on, because it is not a functional location as National is.

I do not think you have to worry about that at National, but this lack of a concerted moving of certain kinds of traffic to the airport that should probably be the dominant airport has never taken place here, and it probably will not, because of the artificial barriers.

Mr. GARVEY. My name is Hugh Garvey. I am not a commercial pilot, but I am a former Navy carrier pilot, so I can address the subject of flying from that point of view. The Fairfax County position as just read by Mr. Foreman does stress that we are not opposed to continued operations at Washington National, but rather that the number of passengers should be capped at 16 million.

To apply that to your question, our concern is perhaps more focused on the aviation safety. We had evidence from operating pilots that on the bad weather days, when the concentration is maximum, the flight safety factor, which I think precedes noise or air pollution problems, does get past their point of preference, but noting that what happens to the excess over 14 million, whether it goes to Dulles or BWI, the rules of the marketplace would probably dictate that.

Mr. ANDERSON. Do you favor continuation of FAA management of National and Dulles, or do you favor an alternative form of management?

Mr. BEATLEY. If you are asking me, I would say that I would favor the kind of operation you have in the other cities of this country that have really great modern progressive airports, and that has to be done by an authority, an organization that is not subservient to an annual appropriation process. For that reason I would definitely not favor, I think the aviation business schedule of transportation operations in this area would be far better and the marketplace would prevail if there was not this intimidation that takes place when an FAA comes up for an annual appropriation here before the Federal Congress, and when an FAA Administrator is asked what are you going to do about my trip to Dallas, and so forth.

Mr. GARVEY. Mr. Chairman, the Fairfax Board of Supervisors addressed that question back in 1974 when it was announced that the then incumbent administration was considering putting both airports up for sale, both Washington National and Dulles. Recalling what Senator Warner said on that subject earlier this morning, in the ensuing 6 years there have been many changes, and I do not think there is a simple yes or no answer right now. The economic study that he is—I think “promising” was the word he used—will provide updated information.

Mr. ANDERSON. Have you received many letters or phone calls supporting service at National because it is more convenient?

Mr. BEATLEY. In support of which?

Mr. ANDERSON. In support of National, because it is more convenient?

Mr. BEATLEY. Oh, yes. We have a good constituency that believes that this is the way to go, and those people do not live too near the flight patterns. I really thought I should have brought—we have many city councilmen. We meet formally the second and fourth Tuesdays at 7:30 in the evening, and there have been numerous council meetings in the summertime when the noise seems to be worse, and when the traffic patterns are for south takeoffs, and your airplanes at takeoff power, they pass a beam at city hall, and there is one witness who said earlier, I believe it was Congressman Barnes, about 20 to 25 seconds all talking is suspended, and we just look at each other and wait, and then you can count on the 67-second cycle to catch you up again in another 35 seconds, and that goes on night after night after night at Alexandria City Council meetings, and it is happening in everybody's backyards up and down 3 or 4 miles of the river, so it is a problem.

Mr. ANDERSON. If the airlines were willing to reduce service at National over the weekends, would this be of great value to the residents of your jurisdictions, and are there any weekend time periods in which a reduction or elimination of service would be particularly welcome?

Mr. BEATLEY. As everybody knows, not just the airline business, Friday nights and Sunday nights are the two biggest nights of the week. Those are the two biggest days, all Friday and all Sunday are the two biggest days in the airlines' operations. There is nothing you can do there. That is when people want to travel, over weekends.

Mr. ANDERSON. Are you aware of any problems created by the present policy of allowing general aviation aircraft which are not jets to operate throughout the night at National?

Mr. BEATLEY. I am a strong supporter of general aviation. I am a charter member in 1938 of the Aircraft Owners and Pilots Association, and I operate a little airport today, so I am a friend of general aviation, but I think in the case of National, you have to break it off at a reasonable hour. If you have a curfew for the scheduleds, I think you should have them for the nonscheduleds, and of course in general aviation you have a wide range of corporate jet aircraft, and some of these corporate jet aircraft actually make more noise than the usual light-body airline jets, so I think it should stay the way it is. You should have the curfew consistent with both categories.

Mr. ANDERSON. You used the term "reasonable hour." What did you mean by "reasonable hour"?

Mr. BEATLEY. A reasonable hour?

Mr. ANDERSON. You said you should have a curfew at a reasonable hour.

Mr. BEATLEY. I think the hour we have now is probably reasonable, but it should be moving toward 9 and not towards 10 in the evening, and it should be moving toward 8 instead of 7 or earlier in the morning.

Mr. GARVEY. Mr. Chairman, just to emphasize Mayor Beatley's point, back to the specific question, yes, we would favor reduction on the weekend just as we would favor reduction toward the goal of holding the line the other seven days of the week, also.

Mr. ANDERSON. How would you suggest improving access to Dulles and BWI airports? It seems to me that to begin shifting traffic to these airports in a wholesale manner will require development of faster service to the downtown areas. In your opinion, what improvements in access are needed, and how should they be paid for?

Mr. GARVEY. If I may, I would like to emphasize the response that Congressman Harris and Congressman Fisher gave you on that from the Virginia and Fairfax County point of view. We have great expectations as far as the increased flow and commuter time and capacity that the opening up of I-66 and Dulles link would provide.

Mr. BEATLEY. I favor the Metro extension, and I also serve as a member of the Virginia Airports Authority appointed by the Governor, and I addressed their annual meeting last year on this subject, and I had some delegates and senators of the State of Virginia of the general assembly, and I took the opportunity to request that they look into helping us fund an extension of the Metro line from the Vienna station on to Dulles, as had been proposed by Senator Spong's feasibility study. And I suggested that in lieu of the toll road, for example, which the State of Virginia was going to finance with revenue bonds, that they might well consider that same right of way, and the elimination of that, and in lieu thereof apply their energies and resources towards the extension to Dulles, and that it would be in lieu of a road, and therefore the road money should fund it.

Mr. ANDERSON. Would a shift to Dulles and BWI have a significant impact on automobile fuel usage in the Metropolitan Washington area, and how much of a role should this play in the decisions that are made?

Mr. GARVEY. If I may go first on that one, if anything, even recognizing the increased demographics that we use these days between the decreasing of the queuing effect which currently exists around Washington National and was attested to by Congressman Harris earlier, the flow of traffic, the other constraints that we are now experiencing in transportation reduction due to the price of the fuel and the availability, on balance we would feel that if anything, the transportation and the fuel-energy question would be improved.

Mr. BEATLEY. I would like to say that I serve on the board of directors of Metro among other things, and I am a strong advocate

of public transportation, and I have strongly believed that a good public transportation tie, such as the extension of the Metro to Dulles, and thereby tying Dulles to the 80-some stations of the total Metro system, which includes the District of Columbia, Maryland, and wherever, I think the net result, if it is designed properly, will be to reduce reliance on the individual auto, and probably have a higher percentage of people arriving at an airport by public transportation than presently exists.

Mr. ANDERSON. What is being done in zoning and land use policy to assure that Dulles does not develop noise problems? We have heard the residential development demands are being made on the area around Dulles. How will we handle these demands?

Mr. GARVEY. That is a very timely question as far as Fairfax County is concerned, Mr. Anderson. The staff out there at the present time is deeply involved in the development of land use in the rezoning of existing land, the application of the NEF, the noise exposure forecast for the area primarily east and due south of Dulles. As you recall, the area west and north of Dulles is actually in Loudoun County, and I think the representative from Loudoun will join us later, but as you might expect, to do our part to avoid these complaints of excess noise and the effect it has on quality of life and our individual lifestyles, the patterns in the approach to Parcher Lanes where the NEF figures decibel count is the highest are being strenuously protected through buffering. That would ideally be left open, and in fact the amount of buffered land around Dulles is significant, and is designed for that primary purpose, but in addition, the approach and departure corridors would be ideally left vacant. If that is not attainable, it would be for industry and then commercial and ultimately residential the farthest away from the airport.

Mr. ANDERSON. Mr. Gering, I believe you have a question.

Mr. GERING. Mr. Beatley, were you a member of ALPA when you were flying?

Mr. BEATLEY. I served as first vice president of ALPA from 1955 to 1957. I served on a committee during those periods of time that studied the National Airport problem. That committee incidentally came up with a recommendation that Andrews Air Force Base be sought as a replacement for the additional growth of National Airport, and at that time Maryland people I think vetoed the whole idea and it became a bad word because they were very protective of Baltimore-Friendship Airport, so we missed an opportunity in those days. And later we studied Chantilly. So I have been involved in various ALPA activities through the years. I cannot speak for them today, because they obviously may have other approaches to this problem, but in the 1950's I was very active, and I only retired from flying in 1976.

Mr. ANDERSON. I hope we can look at the Andrews Air Force Base situation for a possible alternative use, if not air carrier at least commuter and general aviation. Before I ask the question, ALPA, in their testimony do not advocate wide-bodied aircraft at National, and you do in your testimony.

Mr. BEATLEY. I am not speaking from an operational standpoint, although I have cautioned you about the problem associated with heavy aircraft, and all wide bodies are heaviest by definition, over

300,000 pounds. There have been some major accidents caused mostly by lighter airplanes following heavies. However, it need not even follow a heavy, and the testimony that you would reduce the number of flights if you had the wide bodies, it is absolutely mandatory that you reduce it. You cannot have one airplane every 60 seconds taking off, and another airplane every 60 seconds landing on the same runway, one runway. It is impossible. This wingtip vortex problem is something on calm days may exist for 2 or 3 minutes, and a controller and a pilot know this, and you are continually warned when you take off behind a heavy, you are advised, and you have to wait many times 1, 2, or 3 minutes until the controller, the tower controller, advises you well, you take off at your own—take it away if you think it is all right, and you do not have any visual way of checking what has happened to your vortex, because it is invisible. It is an air thing. It is like a dust devil. It is out there and it is invisible, and it comes about through wing designs on heavies, the loads on heavy aircraft.

Mr. GERING. They have a two-pronged problem, though. They say also the low-level turns that you have to make with the river approach would also be a problem.

Mr. BEATLEY. I do not really think so. Most or all airline pilots are professionals. I do not worry about the pilots maneuvering the airplanes in the air. I do worry about them being caught, trapped in times when they are trying to force compression of flights, through too many flights in a short period of time. Then I think the pressure is on the controller and it is on the pilot to follow at times when he has some doubts.

There are other problems. The more serious problem at National Airport is you have got one runway, 6,870 feet long, and I do not know of another major airport that has the kind of density that you have here, that even remotely has only one runway, 6,870 feet long, 10,000 and 11,000 is the standard in most airports.

What happens, though, is that when you have one runway, one instrument approach, and one direction only, you cannot have a back force ILS. You only have one, and National Airport has a category 2, and for the life of me I think it is a very marginal category 2, and it is indicated by the weather minimums that are allowed, RVR, runway visual range of 1,600 feet, whereas Baltimore, Dulles, and virtually every other category 2 airport is runway visual range 1,200 feet, which indicates special problems here.

What I am saying is that when you have one instrument approach, and you have a low ceiling, and you have to land straight in on this one instrument approach, and when the wind says you should be going around the airport and landing in the other direction as you do at Dulles and Baltimore, then the pilot by the book is allowed to land downwind up to 10 knots, and that is if his weight calculations allow it. His flight engineer has to calculate all this for him.

What happens, though, is if you have the low ceiling, and the tower knows that it is 12 or 13 or 14 knots, he says to the pilot, "It is 10 knots," and, you know, "variable" and the pilot says, "Well, how variable?" And they doubletalk back and forth to where you

get some mutual confidence, and finally the pilot elects to land downwind.

Well, this goes on. You are not aware of it, but the pilot knows this, and the heavier plane has a greater problem, because if you ever have any excursion from the numbers, meaning that if you have added a little extra, such as 5 or 10 knots for the wife and kids, you may well, with an unpredicted or unknown, a wind sheer or a tailwind component, you may well be sweating it out at the end of the runway.

I am saying this because it is a problem that pilots have to deal with every day, and at National Airport though it epitomizes, it is the acme of all decisionmaking I am sure under adverse conditions.

I am sure there are people will say well, you rarely ever have a low ceiling and still have a tailwind from the south. Well, that may be true, but it only takes the occasional time to cause you the real big problem.

Mr. GERING. Thank you.

Mr. ANDERSON. Thank you very much, Mr. Beatley, Mr. Garvey, and Mr. Foreman, for your presentations.

Mr. ANDERSON. At this time then we will go on to the next group, the panel of airport users. The names I have are Mr. Norman Phillion, the executive vice president, Air Transport Association; Mr. Richard Henson, president of Henson Aviation, Inc.; Mr. John H. Winant, president of National Business Aircraft Association; Mr. Victor J. Kayne, vice president, Aircraft Owners & Pilots Association; and Captain Bud Ruddy, chairman, Washington Area Safety Committee, Airline Pilots Association.

We have the prepared statements of Mr. Phillion, Mr. Henson, Mr. Winant, Mr. Kayne, and Captain Ruddy. It might be good if you extemporize, and then we will have questions to present to you at the conclusion of the statements by all five of you.

The full text of your prepared statements will appear in the record at this point.

[Statement referred to follows:]

Statement of Norman J. Phillon
Executive Vice President
Air Transport Association of America
Before the Aviation Subcommittee of the
Committee on Public Works and Transportation
U.S. House of Representatives
on the Washington National Airport Policy Proposal
June 11, 1960

My name is Norman J. Phillon. I am Executive Vice President of the Air Transport Association of America. The Association represents virtually all of the scheduled airlines of the United States, including 15 airlines which operate regular service between Washington National Airport and 187 cities in 43 states in response to public demand for reliable, convenient air transportation to and from the Nation's Capital.

We appreciate the opportunity to present the views of our members on the FAA proposal to change its operating policy at Washington National Airport. We are deeply concerned about the proposal. Some parts of the proposal have merit. However, others do not since they would have the unfortunate consequence of arbitrarily reducing operations and thus unreasonably restricting public use of this important airport. Substantial amounts of public service between the Nation's Capital and other communities may be jeopardized if measures such as the forced cutback of airline flights, the arbitrary passenger limitation, and the further curtailment in the hours of operation are adopted as proposed. Air service to and from the Washington area will undoubtedly be reduced and some could be lost entirely. We believe the proposed measures are unnecessarily restrictive and will have a significant, adverse impact on public service unless they are modified.

We understand FAA intends to finalize its proposed Washington National Airport policy on or before August 15, after considering views expressed during the Administrative hearings held in March, and the written comments received in response to the Notice of Proposed Rulemaking during the public comment period which ended April 15.

In our comments, we suggested several modifications to the FAA proposal — modifications which we believe will further FAA's objective of reducing airport noise consistent with the Airline Deregulation Act without unduly impinging upon the nation's commercial needs and the reliance of visitors and the business community on service to and from Washington National Airport. We have serious misgivings about any local airport restrictions and their increasing constraints on the air transport system. There is, however, a special need to assure the most efficient and productive use possible of Washington National Airport because of its importance to the Nation's Capital.

Although we have no way of knowing what FAA's decision will be, we welcome the Subcommittee's interest in this important matter. Your interest provides additional assurance that the major issues, including the broad public interest in the continued availability of vital air service to Washington, will be adequately considered and properly weighed in reaching that decision. In this regard, we would like to share with the Subcommittee our views on the FAA proposal; set forth the modifications which we believe to be necessary; voice our concerns about a forthcoming proposal to replace the airline scheduling committee at Washington National Airport with an auction system; and raise questions concerning the necessity of Dulles Airport.

Before proceeding to discuss these matters, our member airlines wish to express their strong support for the position taken by the Secretary of Transportation on the need to improve Washington National Airport's facilities, in order to make it a proud symbol of our Nation's Capital, and making it a good neighbor. We are hopeful that these hearings will contribute to the attainment of these objectives. Clearly, actions to improve Washington National depend on the development of a plan for its most productive and efficient use consistent with reasonable environmental goals.

Proposed Service Reductions

The FAA proposal would cut airline operations at Washington National Airport more than 18 percent by reducing the airline quota from 40 to 36 per hour from 7:00 a.m. through 8:59 p.m. It would limit to 18 the number of flights between 9:00 p.m. and 9:30 p.m., after which no flights could be scheduled in or out of National Airport. At 10:30 p.m. the airport would be closed to all operations -- airline, commuter and general aviation -- except for emergencies. Moreover, the proposal would impose an arbitrary annual limit on the number of passengers who may arrive and depart from National Airport. Such a limit would have the effect of forcing further cutbacks in the number of airline flights in the next few years when that maximum number is reached.

Washington National Airport, because of its proximity and easy access to the seat of the federal government, is a vital link in the nation's air transport system. Visitors, businessmen, Members of Congress, local and state government officials, federal employees, and other individuals and organizations having urgent business to conduct in traveling to and from Washington, where minimum travel and ground time are essential, demand this convenient access. It is thus clear that the future of National Airport cannot be viewed wholly as a local issue inasmuch as the proposed service reductions will adversely affect many citizens and communities.

In short, unless they are modified, these proposals will have a very negative impact on thousands of people, communities and commercial interests.

Unlike the eleven year old High Density Traffic Airport rule, which restricts hourly operations because of asserted limitations of airport and airway capacity at four major airports, including Washington National Airport, the FAA's pending proposal to reduce airline service at National Airport is predicated upon noise reduction and the diversion of traffic to Dulles and Baltimore airports. The airlines recognize the importance of National Airport's being a good neighbor. However, no convincing showing has been made to justify the serious impact on air transport users that would occur if the proposed changes are adopted. Nor has good cause been shown for arbitrary government intervention in the marketplace in order to force distribution of traffic among the other airports involved.

Airline Proposed Modifications

In our comments to the FAA in response to the proposed rulemaking on Washington National Airport, we suggested modifications which would achieve meaningful noise relief without undue encroachment on air transportation and the needs of individual travelers. These are not and ought not be mutually exclusive objectives, particularly since the airlines are operating fewer flights today at Washington National Airport than they did 10 years ago, and are doing so with more environmentally acceptable aircraft. Moreover, the airlines are engaged in an equipment replacement program which will introduce even quieter and more efficient aircraft.

Our recommended modifications would restructure the rule to allow a greater number of airline operations during those hours when the ambient noise level is high and reduce them when it is low. We believe such a restructuring can be accomplished without exceeding the total of 60 operations per hour for all categories

of users, the number permitted under the current rule and the FAA proposal. It would also recognize the more environmentally sensitive early morning and late evening hours, particularly on Saturdays and Sundays. The following table (Table I) sets forth our suggested revision to the quotas:

TABLE I
ATA SLOT ALLOCATION PROPOSAL

Mon-Fri	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	34	44	44	44	36	36	44	44	44	44	44	44	44	44	36	618
Commuter	14	12	12	12	12	12	12	12	12	12	12	12	12	12	12	182
Gen. Aviation	12	4	4	4	12	12	4	4	4	4	4	4	4	4	12	100
Total	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	900

Saturday	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	32	40	40	40	36	36	36	40	40	40	32	32	30	30	30	534
Commuter	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	120
Gen. Aviation	10	4	4	4	8	8	8	4	4	4	4	4	4	4	4	72
Total	50	52	52	52	52	52	52	52	52	52	44	44	44	44	44	726

Sunday	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	28	34	34	36	36	36	36	44	44	44	44	44	44	44	36	584
Commuter	8	8	8	8	12	12	12	12	12	12	12	12	12	12	12	164
Gen. Aviation	10	4	4	4	12	12	12	4	4	4	4	4	4	4	12	98
Total	46	46	46	48	60	60	60	60	60	60	60	60	60	60	60	846

	Current Allocation	ATA Proposal	FAA (1)	FAA (2)
Air Carrier	4,480	4,216	3,654	3,654
Commuter	886	1,186	1,216	1,326
Gen. Aviation	1,344	876	1,216	910
Total	6,726	6,278	6,086	5,890

1/ 18 operations 9:00 p.m. to 9:29 p.m. 18 operations 9:30 p.m. to 9:59 p.m.

2/ 15 operations 9:00 p.m. to 9:29 p.m. 15 operations 9:30 p.m. to 9:59 p.m.

3/ 18 operations 9:00 p.m. to 9:29 p.m. 18 operations 9:30 p.m. to 9:59 p.m.

Our proposed modifications also provide for a substantial increase for the commuters while reducing both the scheduled airline and general aviation quotas. It would increase the commuter allocation to a minimum of 12 flights per hour

Monday through Friday and most of Sunday, reducing them to 8 per hour on Saturday. Airline operations would vary throughout the day Monday through Friday from a low of 34 to a high of 44 with the reduced allocations at both ends of the day. Equally important, the number of airline operations on Saturday and Sunday would be reduced significantly — down by 106 flights on Saturday; on Sunday the reduction would be 56 flights, most of which are from 7:00 a.m. through noon.

As reflected in Table I, our proposed modification would reduce the general aviation quota both during the week and on weekends. In most instances, this reduction would be added to the commuter quota, and is in keeping with what we take to be the generally accepted belief that any scarce resource should be allocated with a view of achieving the most efficient and public oriented use of that resource. In this connection, the relative efficiency of general aviation, airline and commuter use of the airport and airway facilities is revealed by comparing the respective passengers per operation carried by each group at Washington National Airport. Table II makes this comparison for the years 1972 and 1979.

TABLE II
Calendar Year 1972

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{4/}
Air Carrier	10,689,981	96.1%	218,984	86.1%	48.8
Commuter	250,002	2.3%	30,746	9.3%	8.1
Gen. Aviation	182,002	1.6%	81,699	24.6%	2.3
Total	11,121,985	100%	331,429	100%	----

Calendar Year 1979

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{4/}
Air Carrier	14,377,825	94.5%	207,112	58.7%	68.9
Commuter	632,567	4.2%	48,594	13.8%	13.0
Gen. Aviation	223,614	1.5%	87,198	27.5%	2.3
Total	15,135,017	100%	352,904	100%	----

^{4/} In the case of general aviation, crews are included in the passenger count; in the case of air carriers and commuters they are not.

The changes we are proposing in the general aviation quota would not reduce the percentage of slots available to that category below the percentage historically assigned by the High Density Traffic Airport rule at Lagueardia, an airport comparable in many ways to National Airport. The quotas tend to be absolute limitations for the airlines and commuters who must operate on a schedule. On the other hand, general aviation operators have greater flexibility since they are not bound in IFR weather to operate on a schedule. Most general aviation aircraft requesting access to National Airport in VFR conditions have been accommodated. Illustrative of this point is the fact that while general aviation's quota represents 20 percent of the hourly slots, during 1979 general aviation activity accounted for 27 percent of all operations at National Airport. Virtually all of these operations occurred during the quota hours.

The FAA proposal would impose an arbitrary annual limitation on the number of passengers using Washington National Airport of 18 million without regard to the potential of the airport to handle more than that number. Since the 18 million passenger total is expected to be reached in the next few years, the proposal appears to be designed to provide for a rolling reduction of airline operations in the near future. We believe that 18 million annual passengers might be a reasonable target for planning purposes, provided it is not made an arbitrary ceiling on the use of Washington National Airport by the public. If used as a planning target in connection with the development of a master plan, however, we submit that the number should apply exclusively to passengers originating or terminating at Washington National Airport. Those passengers who are merely changing airplanes do not leave the terminal building complex and, therefore, have no impact on the roadways, public parking lots or curbside facilities.

These areas, rather than terminal buildings, are the ones commonly cited as the areas of greatest congestion. This being the case, it does not appear reasonable to include connecting passengers in any total for planning purposes.

Another deficiency in FAA's proposal to limit passenger use to 18 million is its failure to take appropriate account of the increased use of the Metrorail system by passengers traveling to and from National Airport. By the end of 1979, according to FAA, approximately 18 percent of the passengers using the airport arrived or departed by Metrorail. As the Metrorail system is extended, and the costs of gasoline and all forms of ground transportation increase, there is little doubt that this percentage will increase significantly. Like connecting passengers, those who use Metrorail have minimal impact on the groundside areas at National Airport, a fact that should be taken into account when reaching a final decision as to the number of passengers to be included in the planning figure.

We believe it appropriate for FAA to propose policy changes to avoid the bunching of arriving and departing flights in the closing moments of the last hour of operation. As we suggested in our comments, this can be done by forbidding scheduling after 9:59 p.m. with no more than 12 flights permitted between 9:30 p.m. and 9:59 p.m. If this suggestion is adopted along with the reductions and the staggering of hourly quotas previously discussed, there can be no compelling reason for adopting the more extreme measure proposed by FAA forbidding scheduled operations after 9:30 p.m.

Possible Changes in Slot Allocation Methods

FAA has stated its intention of issuing a notice of proposed rulemaking in the very near future suggesting the need for an alternative method of allocating the airline quota at Washington National Airport. We understand that among the

alternative methods to be considered in the proposed rulemaking is an auction system. A precise evaluation of the feasibility and impact of such a system, cannot be made until the proposal is released. Clearly, an auction system at National Airport, in addition to existing landing fees, will cost the airlines and their passengers many millions of dollars annually. We have been advised that the extent of these additional costs will be discussed in the forthcoming rulemaking.

We have questioned the use of quotas since the High Density Traffic Airport rule was first proposed in 1968 and continue to do so. However, since the rule became effective over 10 years ago, the FAA has looked to the airlines voluntarily to adjust their operations in order to meet the limitations using scheduling committees for that purpose. During this period of time, the airline participants in these committees have successfully adjusted their schedules to meet the airline quotas at all four controlled airports — O'Hare, Laganardia, Kennedy and Washington National. Despite their divergent interests, the airlines have been able to make the adjustments required to achieve compliance with the airline quota during every controlled hour on every day at all of the four airports.

This has not been easy, especially at Washington National Airport. Since the Airline Deregulation Act of 1978 became effective, 10 new entrants have elected to serve that airport, have participated in the meetings of the Washington committee, and have obtained slots. No one has ever challenged the legality of the committees or the probity of its deliberations. Nor has anyone, including government observers, ever challenged the results of the open committee working sessions. Despite this record of achievement, certain federal government officials have expressed a preference for alternative methods of allocating the airline quotas. The alternatives that have been suggested include lotteries, peak hour surcharges, auctions and administrative assignment by FAA.

In July 1979 the CAB and FAA jointly commissioned a consultant to study pricing mechanisms as a means of allocating airline slots. Since the consultant was not asked to develop an operating system, he did not address the many questions and problems which would face government and industry in attempting to design and implement the auction system which he recommended. The consultant reached the conclusion that each slot in each hour at each controlled airport should be auctioned off every six months in a sealed bid, one-price auction with an after-market. In other words, the lowest successful bid would determine the price paid for all slots. At the conclusion of the auction, any airline could buy or sell a slot at whatever price the market would bear.

On January 15, 1980 we filed comments on that study urging that it be rejected because it was operationally unsound. A copy of our comments is being provided for the record. More recently, a consultant engaged by FAA has recommended a similar auction system for trial at Washington National Airport. The airlines remain deeply concerned about any auction system involving the proposals of these two consultants.

These proposals raise many serious questions which should be of concern to all aviation interests and policy makers. First, no showing has been made of any need to replace the scheduling committees which have the virtue of having worked. Second, there is no justification for replacing a proven system with one that may not work effectively and will add significantly to the cost of air transportation. Third, an auction system clearly would adversely affect short haul, small community airline service. Fourth, an auction system at Washington National Airport, even if successfully implemented, would inevitably affect flight operations at other airports receiving service from National Airport for no valid reason. Fifth, there are numerous questions as to the legal authority to establish an auction system and to

collect and dispense the proceeds realized from it. Finally, the auction system under consideration would introduce an airline economic regulatory mechanism more pervasive than that which Congress decided just 18 months ago to terminate. A federally-administered system having the inevitable effect of determining which short and longer haul markets would or would not be served, which airlines would or would not operate, and the level and cost of the service provided, clearly is in conflict with the purposes and objectives of the Airline Deregulation Act.

In its final action on H.R. 6721, reauthorizing the Airport and Airway Development Act of 1970, the Committee adopted an amendment directing a study of airport access issues including the allocation of airport facilities and airspace. We strongly urge the Committee to take appropriate steps to insure that no alternative allocation system, especially an auction system of the kind now under consideration by FAA, be implemented anywhere at least until these issues are thoroughly explored as called for by the House ADAP legislation.

Accessibility of Dulles Airport

The airlines serving Washington National and Dulles airports have a high regard for the professionalism and dedication of the FAA airport staff in the maintenance and operation of these two important facilities. Because of its proximity to the Capital City, Washington National Airport is easily accessible. It is, therefore, the more convenient airport and is preferred, and will continue to be preferred, by most travelers. Dulles Airport also serves a vital role but its distance from downtown Washington is a distinct drawback, and travelers find the 45 minute to one hour surface time burdensome.

When Dulles Airport opened in 1962 it featured an airport-only approach road to assure unimpeded passenger access. A right of way for another 2-1/2 miles of access road from the Capital Beltway to the future site of Interstate Route 66

was also acquired. There was an extensive delay in the construction of I-66 because of environmental objections, but this problem has now been resolved and the highway is under construction with a scheduled completion date of December 1981.

The completed Dulles access road link will join I-66 in Falls Church and this road combination will reduce the driving time from downtown Washington to Dulles Airport. While this improved access to Dulles Airport should be a top priority, this is not the case. The completed Dulles access road link was estimated in 1978 to cost about \$26 million. However, in its fiscal year 1980 budget request, the FAA asked Congress for only \$4 million — an amount subsequently frozen by the Executive Branch.

Interstate Route 66 is scheduled to be completed in December 1981. At the current degree of effort, however, the link to the Dulles access road will not be completed any earlier than 1985, and probably will be delayed even further. It is extremely doubtful that more passengers will be encouraged to use Dulles at least until its access is made more convenient. This problem, together with the proposal to further limit operations at Washington National Airport, and a proposed auction system increasing the cost of air transportation to the Washington area, underscores the difficulties of the airline industry in planning needed public service for the Washington metropolitan area.

Conclusion

The Subcommittee's long-standing interest in assuring that essential public air transportation needs are met as efficiently and economically as possible is clearly manifested in the Airline Deregulation Act of 1978 and in the recent reauthorization of the Airport and Airway Development Act of 1970. The FAA proposal on Washington National Airport encompasses changes which are in conflict with these Congressional objectives.

As reflected in communications to FAA from scores of individuals, communities, business groups, and local, state and federal elected officials, there is substantial public concern that the FAA proposal will adversely affect the availability and convenience of air service to Washington. The Subcommittee is respectfully urged to consider these concerns and to take appropriate action to assure the continuation of adequate public service at Washington National Airport.

TESTIMONY

OF

RICHARD A. HENSON

PRESIDENT, HENSON AVIATION

AND

ACTING CHAIRMAN

WASHINGTON NATIONAL COMMUTER

AIRLINE ASSOCIATION

BEFORE THE

AVIATION SUBCOMMITTEE

OF THE

HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

HEARINGS ON

"DOT PROPOSED WASHINGTON NATIONAL AIRPORT POLICY"

June 11, 1980

Thank you for the opportunity to present the views of the Washington National Commuter Airlines Association on the FAA proposed plan for the future of Washington National and Dulles International Airports.

The FAA proposal contains basically two provisions of concern to the commuter air carrier industry. The first is the change in the hourly quota on operations (slots) at Washington National Airport. The second is the expansion of the curfew placed on Washington National.

The Washington National Commuter Airlines Association ("WNCAA")^{1/} supports the Federal Aviation Administration's proposed policy for metropolitan Washington airports. WNCAA specifically supports the positive step proposed as Alternative B with regard to Washington National Airport ("DCA"). Alternative B will ease the untenable operational squeeze in which DCA commuters find themselves as a result of the unprecedented growth in demand for their services. WNCAA also urges the FAA to increase commuter slots somewhat more, in concert with a modest expansion of operational hours, for commuters only.

The increase in commuters' operational hours will relieve the demand for prime time slots, thereby making an increase in commuter slots a logical step in support of small community service. The rapid growth of commuter operations makes imperative such an expansion of DCA's availability to these growing small community service specialists.

1/ AeroMech, Inc., Commuter Airlines, Inc., Cumberland Airlines, Henson Aviation, Inc., Ocean Airways, Inc., Pennsylvania Commuter Airlines, and Ransome Airlines are the WNCAA participants in these comments. Altair Airlines, Inc. does not participate in the comments.

The Administrator of the FAA himself has stated that:

The air consumer industry is entering a period of exponential growth, serving economically the smaller cities that were often served at a loss by the major carriers.^{2/}

While the Administrator did not state it directly, he also implied that if something is not done at airports to accommodate this exponential consumer growth, it will come to a screeching halt. The big loser if that happens will be the small community passengers. They already have lost the major certificated carriers, which abandoned their cities and towns. If commuters, then, cannot be accommodated at airports like DCA, the small community passengers will lose air service altogether.

Quotas Reflect a Failure to Gear Airport Capacity To Demand

WNTA believes that the first tenet of FAA policy should be to design airport capacity to meet consumer demands rather than constrain consumer demands to meet airport capacity. The solution to the problem of airport congestion lies in the expansion of existing facilities and the development of separate access procedures to safely and efficiently take small aircraft flights out of the large aircraft approach and departure routes. The "solution" of restricting capacity is no real solution and is symptomatic of larger problems affecting productivity in the national economy. The FAA should not be coercing passengers to use less convenient facilities, but should be attempting to meet their needs.

The FAA's High Density Rule, established in 1969, has outlived its usefulness. Time, technology, construction and advanced FAA air traffic control procedures have eliminated the congestion of 1967-1968, which led to development of the rule. Today,

2/ Remarks of Lavigne Bond before the New York Society of Security Analysts, New York, April 7, 1980.

the High Density Rule only serves to place an artificial constraint on the use of the four airports under the rule.

Safety is not now and never was an issue in the imposition of quotas. The original High Density Rulemaking clearly stated that the purpose of the rule was to eliminate delays. The FAA's systems and procedures are designed to provide for safe operations at all airports. Clearly, there is no difference between the level of safety at the major hub airports that are slot constrained and those that do not have limits on the total number of operations.

The quotas at the four constrained airports limit the number of scheduled flights, not the number of operations at the airports. The Air Traffic Control System can handle more operations than the quotas permit, as demonstrated by the number of extra sections of flights and unscheduled flights actually handled at these airports. The only real limitation of quotas is the constraint on the published scheduled flights of air carriers.

WNCAA believes that if quotas are to be imposed, they should be directed to a specific problem and maintained only until a solution is found to that problem. Quotas should be viewed as a temporary fix, not a long term solution to a problem. For example, if quotas are imposed for noise reasons, then only "noisy" aircraft should be subject to the quota. Or, if quotas are imposed because of congestion on a runway, then only those aircraft using that runway should be subject to the quota.

Commuter Slots Should Be Increased To At Least 15 Per Hour

The FAA proposal for the future of Washington National Airport would change the hourly allocation of operations (slots) from the present level of:

40 for certificated air carriers

8 for commuter air carriers

12 for general aviation

to

36 for certificated air carriers

12 or 15 for commuter air carriers

12 or 9 for general aviation

WNCAA strongly urges that the FAA, at the very least, adopt 15 slots per hour for commuters.

In addition, the WNCAA requests that the FAA give most serious consideration to increasing commuter slots somewhat more. There are at least two compelling reasons for this request. First, section 93.123 of the FAA's proposal would group all carriers in the commuter category if they operate aircraft with less than 56 seats. This means that the large "air carrier" pool of slots will have several carriers deleted, while the commuter slot pool will have several carriers added to it. Thus, the demand for commuter slots will be even greater than it is today, while large carrier slots will be somewhat relieved of current demand levels.

Secondly, there are a far larger number of commuters today, both in absolute terms and in terms of demand at DCA. In order for this large number of carriers to operate their small community flights into DCA, the slot pool must be expanded. With large air carriers abandoning small towns and commuters adding those same towns, the number of commuters and their operations are growing much faster than any other segment of the industry, as acknowledged by the Administrator.

An ancillary reason for expanding commuter slots, rather than forcing additional commuter flights to operate into the two airports at greater distances from the city of Washington is, simply, time. Air transportation is a function of time.

Almost everyone would use surface modes if they could move from point to point as rapidly as on an aircraft. If that were the case, our highways would be bumper-to-bumper.

Commuter service, therefore, performs a very valuable function -- it moves many people in a short period of time. If, however, a commuter flight takes 30 minutes to get to the Washington area, but ground transportation from the airport takes another hour, the value of commuter service is destroyed and passengers will drive again. This is not true for the passenger who travels 600 miles on a longhaul air carrier.

Thus, if commuter slots at DCA are not increased, the whole purpose of the small community service program of the Airline Deregulation Act is undermined. Passengers may want to use commuters which are replacing large air carriers, but not if the passengers' travel time is increased to the point that they just as well drive.

WNCAA, therefore, urges the FAA to increase commuter slots slightly more than the level suggested in Alternative B for DCA.

Curfew Should Not Be Expanded

The FAA proposes to prohibit air carriers from scheduling operations at Washington National after 9:30 p.m. and before 7:00 a.m. and to close the airport for all traffic, except emergencies from 10:30 p.m. to 7:00 a.m. The current FAA curfew closes the airport to jet aircraft from 10:00 p.m. to 7:00 a.m.

As discussed above, commuters require a significant expansion of slots at DCA, or the small community service program of the Deregulation Act will be hamstrung in this geographical area. If the FAA will effect the expanded level of commuter slots and permit a full number of commuter flights one and one-half

hours before the proposed morning lifting of the curfew and one and one-half hours after the evening curfew, DCA short/medium haul passengers can be accommodated as they should be.

Even before the Deregulation Act, commuters had a unique problem in the industry. In the morning, commuters must bring their small community passengers to DCA in time to connect with the first large carrier flights. In the evening, inbound passengers on the last large carrier flights seek commuter service to small communities. The Deregulation Act has intensified this demand by a multiple of its former level.

If, therefore, the FAA is to coordinate its policies with the Deregulation Act, it must not virtually choke off commuters' ability to move small community passengers. This will happen, if in blind policymaking, commuters are treated as if their aircraft create the same environmental problems as turbojet aircraft.

Purely and simply, commuter aircraft by and large are not noise polluters. They generally are turbopropeller aircraft, with sharply lower noise levels than turbojets. WNCMA urges the FAA to recognize this distinction by permitting commuters to operate at normal slot levels one and one-half hours outside of either end of the large air carrier curfew.

WNCMA's suggestion will accomplish several beneficial and environmentally acceptable goals. It will permit commuters to do exactly what the Deregulation Act intends for them to do -- move small community passengers. There is no possibility of carrying a businessperson or anyone else from a small community in the morning so that a larger carrier connection can be made at DCA, if commuters cannot operate into DCA before the curfew is lifted and the large carrier flights leave.

The same is true at night. If commuter and large carrier operations must cease at the same time, there is no conceivable way to carry to the small community destination, a passenger connecting from a large carrier's last flight.

Since the facts are indisputable, the only question is an environmental one. Do commuter aircraft noise levels cause such discomfort that, with the same broad brush, they should be banned at the same hours as pure turbojets? Obviously not, and the FAA has in its own files the data necessary to construct a practical rule which will have an evening step-down and morning step-up curfew.

For example, all aircraft could operate during non-curfew hours. Then, the first step-down curfew could prohibit turbojet operations which cannot meet an environmentally acceptable noise footprint at DCA. This will cause a drop off in noise to an acceptable (usually not even noticeable) level. During this one and one-half hour period, commuters would be able to move the passengers connecting from the last "noisy" flights, to their destinations. A similar inbound step-up noise level would take place in morning operations.

This phased curfew would also defuse the volatile peaking of noise at curfew times. If commuters are able to operate their "quiet" aircraft during phase-in and phase-out periods, many aircraft operations will be removed from the peak noise times. This would be an additional relief for the noise assaulted residents around DCA.

The phased commuter curfew clearly would carry with it a safety benefit. With commuter operations not peaking at the same time as large carrier operations, air traffic control, runway, taxiway and ramp facilities all would benefit from fewer movements per hour.

There is, finally, a separate consideration in favor of the phased commuter curfew. The longer the lines of aircraft on the taxiways and in the air, the greater is the waste of expensive, scarce fuel. In today's world, every drop of fuel burned in vain brings our country closer to the day when travel may not be possible at all. The airline industry has taken every known fuel conservation measure within reason. However, air carriers have no control over holding patterns or waiting in line to takeoff.

WNCAA's proposed phased commuter curfew will remove the DCA commuters from the peak holding patterns in the air and on the taxiways, since they will be able to move before and after the peaks. The untold thousands of gallons of fuel saved because of this simple, logical method of administering a curfew, is required by the problems we all face in our fuel-short economy. It should, in fact, be a part of our national energy policy at any curfewed airport.

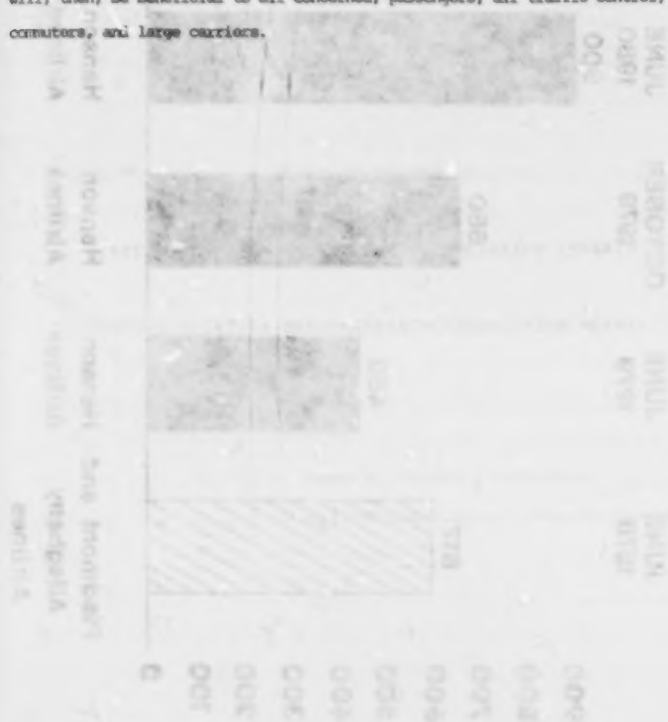
Conclusion

The WNCAA is a group of commuter carriers struggling with the DCA slot problem just as earnestly as is the FAA. The difference is that to the WNCAA carriers, it is a matter of economic life and death. There is no other airport to which the commuters' small community passengers can be carried, without destroying the reason to travel on a commuter. On the other hand, the slot levels of today are rapidly strangling the commuters' operations.

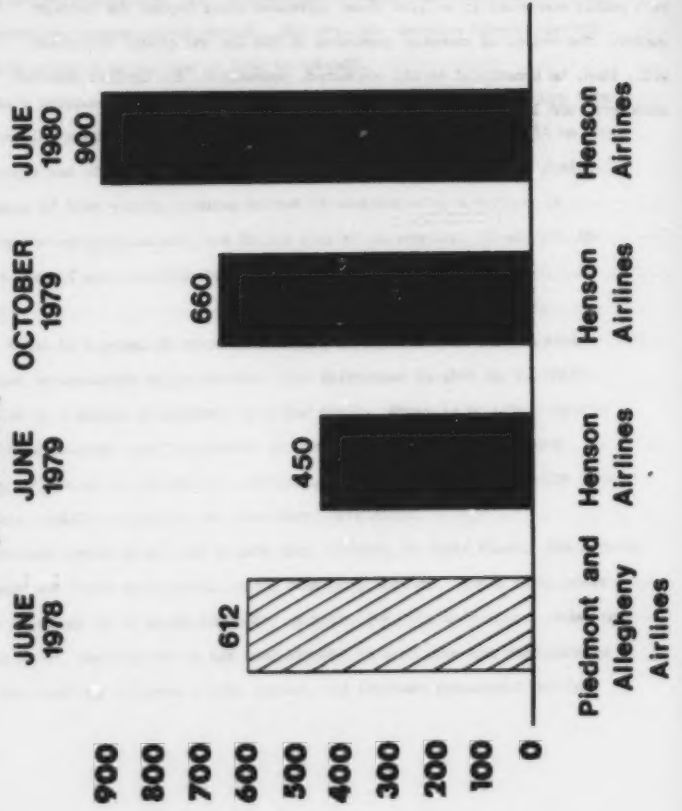
Commuters cannot simply add a wide body aircraft to their fleet. Their forte is frequency and their specialty is small community service. There is no place in either frequency or at small community airports for wide body jets. Under the Deregulation Act, great pressure has been brought to bear upon the commuters to increase frequencies, increase points served, and increase passengers carried.

Today, however, the DCA commuter slot level is a solid wall preventing any of these statutorily mandated changes.

The only solution is to increase DCA commuter slots a reasonably significant amount. The corollary relief is to create a phased curfew which will permit commuters to utilize these increased slots beyond the turbojet curfew. The relief of commuter pressures on DCA air and ground facilities will, then, be beneficial to all concerned, passengers, air traffic control, commuters, and large carriers.



Seats Available Per Day At Patrick Henry Airport (in and out)



JUNE 7, 1980

SUBCOMMITTEE ON AVIATION

COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

UNITED STATES HOUSE OF REPRESENTATIVES

JOINT STATEMENT OF

NATIONAL BUSINESS AIRCRAFT ASSOCIATION (NBAA)

GENERAL AVIATION MANUFACTURERS ASSOCIATION (GAMA)

John H. Winant, President

National Business Aircraft Association

My name is John H. Winant and I am the President of the National Business Aircraft Association. This statement is given on behalf of the General Aviation Manufacturers Association (GAMA) and the National Business Aircraft Association (NBAA).

NBAA represents business aviation in the United States and consists of more than 2,000 member companies which operate aircraft of all types in the day-to-day pursuit of their business objectives.

GAMA is a national trade association representing thirty-nine U.S. manufacturers of general aviation airplanes, engines, avionics and component parts.

These hearings come at a crucial moment when we are increasingly disappointed and frustrated by the actions of the FAA and Department of Transportation (DOT). After years of cooperative effort in developing acceptable aircraft noise standards, the voluntary expenditure of enormous sums of money, we are now faced with the quandary of the same DOT/FAA proposing to prohibit use of those same aircraft, all on the basis of political expediency.

Admittedly, these are strong words but we hope our explanation will convince the Committee that DOT's proposal is indeed not

only political but is arbitrary, if not arrogant. ✓ General aviation and business aviation, in particular, is extremely interested in what regulations are established for the Metropolitan Washington Airports for four equally significant reasons:

(1) Washington serves as the political focal point of the Nation with Presidential, Congressional, and Federal agencies' actions, policies and regulations drastically affecting the operations and decisionmaking processes of the country's business community. Such an influence demands that businesses have a continuous access to the Nation's capital in order to promote a healthy economic environment. For many companies this vital access is supplied principally by company aircraft.

(2) Any action taken by the Federal Aviation Administration (FAA) in its role as proprietor of Washington National Airport (DCA) and Dulles Airport (IAD) will be mirrored by airports throughout the United States ✓

(3) The proposed Washington airports policy addresses two critical issues which will have a significant influence on the health of our national air transportation system--airport environmental considerations and airport capacity limitations. ✓

(4) The existing proposal replaces an agreed to operating plan that took industry, users, the public and FAA almost two years of hard, collective work to develop. This proposal was apparently summarily dismissed when the change of Administration occurred in the DOT and was replaced with this latest, more restrictive and arbitrary proposal:

The DOT proposal includes permitting a substantial rise in passengers handled, changing the reservation system for aircraft operations, changing the non-stop range for air carrier operations and limiting the airport operating hours by instituting a curfew. Although all of these proposed changes may interrelate, the most important and potentially repressive are the curfew and the operations allocation.

Night Curfew Restrictions

✓ The DOT now proposes to shut down DCA at night. For more than five years, general aviation turbojet operators have done an excellent job adhering to the existing voluntary curfew between the hours of 11:00 PM and 7:00 AM. More repressive regulation is not needed. A review of all the operations at DCA for February 1980 yields only four general aviation turbojet operations, that is less than one per week, outside the normal operating hours of the airport. We insist that the general aviation operators are

good neighbors who have done an extraordinarily fine job of reducing the noise impact, at least their share of it, at DCA and they do not deserve to be arbitrarily punished with constrictive unnecessary regulations.

Currently, about sixty-five percent (65%) of the business aircraft ^{fleet} meets or is well below FAR 36 certification standards. Older aircraft are being retired and replaced with new-technology quieter aircraft or retrofitted with new quiet, more fuel efficient engines. Successful retrofit kits have been developed and are being installed on quite a variety of older turbojet aircraft such as the Jetstar, Sabreliner and BH 125. The general aviation turbojet fleet is getting very much quieter at a very fast pace.

There is absolutely no rational need to close National Airport at night. For years FAA has known that night aircraft operations at DCA are not objectionable as long as some control over the more adverse noise levels can be exercised. This is exemplified by turboprop and piston engine aircraft's unrestricted use of National around the clock.

The foundation for building a rational noise level control structure which is responsive to the needs of the community and the aviation users has already been laid by the FAA through its

separate handling of propeller and turbojet aircraft in relation to the voluntary curfew requirement. NBAA believes that a more effective and reasonable approach to controlling DCA nighttime operations can be built upon this foundation through the establishment of noise level limits based on FAR Part 36 noise levels. Aircraft which can be operated in compliance with the applicable FAR 36 noise levels should be permitted to use DCA at all hours. While this approach will not keep all aircraft from using the airport at night, it will ensure that the primary motive of the proposed curfew is realized--that is, to reduce the environmental effects of National's operations through voluntary compliance by aircraft operators. The Administration fails to show, in either the proposed rule or the required Environmental Impact Statement, that there would be any benefit to the community from a curfew of general aviation flights at National Airport. The curfew would be far more than a mere inconvenience, and in fact would impose an unnecessary burden on the community. It would eliminate possible options of users and force them into a more crowded time period.

The "benefit" to the community that FAA refers to presumably would result from a reduction of the noise within the community. However, no supporting data is presented which shows what reduction, if any, in the community noise level would result if all general aviation flights during the proposed curfew hours

ceased.

The fact is, that for the kinds of general aviation aircraft that use National Airport, there would be no effective reduction in noise. This is true because the noise levels of general aviation aircraft that have used National Airport produce sound levels within the community that are below the ambient noise levels.

In the Proposed 1978 Metropolitan Washington Airport Policy, FAA established that the community noise level would not be adversely affected by general aviation aircraft, operating at Washington National between the hours 10:30 p.m. and 7:00 a.m., that achieve noise levels of no more than 98 EPNdB for the approach conditions and 89 EPNdB for the takeoff condition, at the FAR 36 reference points.

There have been no changes in noise conditions surrounding Washington National Airport since that time. In fact, the manufacturers have redesigned or eliminated most of the noisier aircraft.

Business aircraft operators are good neighbors and want to continue to be so. We find it very ironic that the Administration proposes to close DCA at night when there are an extremely limited number of operations which occur at night.

General aviation aircraft operators would be severely penalized by tough regulations and the supposed beneficiary of those regulations will never know because there will be no practical reduction in the noise levels which they experience.

FAA appears to ignore the successful experiences and methods used by other major airports. Sound monitoring systems (which the FAA now has) are used to measure compliance with aircraft noise levels and operators not able to meet them are not permitted to use the airport. In addition, operational procedures are adjusted to reduce unnecessary aircraft noise. All of these methods have been utilized by airports such as New York-LaGuardia and Boston-Logan while operating within the 1976 Department of Transportation aircraft noise policy.

Reduction of General Aviation Slots

The current IFB reservation (slots) allocation system is an ill-advised artificial restraint on the growth of airside operations at National Airport. The 60 hourly slots which are divided among the users were established in 1969.

Advances in air traffic techniques and technological equipment improvements have developed to the point where 60 slots an hour are no longer meaningful at DCA. Today's National Airport

traffic counts show that the 60 hourly slots are exceeded continuously without any adverse effects on the system.

If one of the primary objectives of the proposed policy is to put a cap on the total number of air carrier passengers which use DCA, it makes little sense to increase the total number of scheduled public carriage flights by shifting 3 hourly slots from general aviation to the commuters. General aviation activity and passenger movements both on the air and landside are segregated from the terminals used by scheduled service activities. As such, general aviation operations do not contribute significantly to terminal saturation.

If additional slots are desired for commuter operations, FAA should either reallocate air carrier slots or face the fact that the number of slots allocated at the present time is an archaic figure and increase the total number of slots to recognize real world operations.

The only time the 60 operations per hour limitation might be justified is under severe IFR conditions when the weather is below circling minimums. Under such weather conditions delays are encountered at all airports in the United States. Such adverse conditions in our Nation's Capital is the exception rather than the rule and the development of a slot system based

on the "exception" grossly degrades National's participation in this country's air transportation system.

We find still more irony in any "slot" proposals which would further restrain general aviation use of the airport. Certainly, if the purpose of the proposed policy is to reduce noise, general aviation operators, using aircraft which are significantly quieter, across the board, should be awarded more, not fewer, slots; and if the purpose of the proposed policy is to limit the number of passengers to use the airport because of ground congestion, real or imagined, then general aviation should be allowed more, not fewer, operations since their contribution to the total passenger congestion of the airport is negligible.

The proposed transfer of any slots, during the regular business hours of Washington National, from general aviation to the commuter airlines, is unjustified under the present conditions. The needs of the commuter are important and are growing, but are speculative, as stated by FAA ("...may even be able to stimulate new service to more communities that have not had direct air carrier access to Washington"). The needs of general aviation, really, the flight needs of government and business, are great, as shown by FAA ("...the number of general aviation operations exceeded 12 during 225 of the 320 weekday hours subject to allocation"). The needs of general aviation for these slots are not speculative, but are real and demonstrated.

We appreciate the opportunity to comment on this matter, and will gladly answer any question.

STATEMENT OF VICTOR J. KAYNE, SENIOR VICE PRESIDENT
AIRCRAFT OWNERS AND PILOTS ASSOCIATION (AOPA)

Regarding Proposed Restrictions on Washington National Airport
Prepared for Hearings June 11, 1980 before the
SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
U. S. HOUSE OF REPRESENTATIVES

I am Victor J. Kayne, Senior Vice President of the Aircraft Owners and Pilots Association, representing more than a quarter of a million members who use private aircraft for business and personal purposes.

Our members account for the ownership of about 70% of the aircraft in the U.S. civil fleet and 80% of the hours flown in U.S. civil aviation. Many of our members use Washington National Airport and other metropolitan Washington airports, both as passengers on the scheduled airlines and in their own aircraft.

We have a strong interest in the actions proposed by the FAA with regard to Washington National Airport, not only from the viewpoint of the direct impact on the users of that airport, but also with regard to the precedent that this would establish for other airports around the nation. The FAA, on behalf of the Federal government, should not be setting bad examples for others to follow.

We have filed formal comments with the FAA with respect to Docket No. 19948, entitled "Metropolitan Washington Airports," and with respect to Docket No. 19950, entitled "Metropolitan Washington Airports; Proposed Policy."

We oppose both the proposed curfew and the proposal to impose further restrictions on general aviation operations at Washington National Airport through a reduction of the general aviation slots under the quota plan.

The existing quota was established in 1969 on the grounds that undue delays were occurring to arriving and departing aircraft. This action followed a slowdown in traffic handling by the air traffic controllers.

The FAA now is trying to use the quota restrictions to control the number of passengers passing through the terminal building, with the objective of diverting all in excess of 18 million a year to Dulles and Baltimore-Washington International airports. This is described by the FAA as a means to "manage growth." It may be more aptly described as a means to "constrain growth" or to deny service to those who would otherwise use National Airport. In effect, it is tampering with the marketplace under the guise of safety and efficiency. This is not a proper function of the FAA.

The FAA proposal to establish a cap of 18 million passengers as the annual flow through Washington National Airport is justified as an effort to more evenly distribute passengers between National, Dulles and BWI. The FAA states the objective of reducing National's share of passengers significantly below its present level of 67% to

achieve "better utilization of existing and planned airport capacity." The net effect would be to adversely affect utilization of airport capacity rather than to enhance it.

The FAA proposal specified that four commuter operators currently operating aircraft with less than 56 seats and utilizing approximately 20 certificated air carrier slots per day would be forced to use commuter slots. This obviously would make that many additional slots available to the large carriers, but no mention is made of this in the overall slot/passenger accounting.

General aviation does not use the airline passenger terminal buildings at Washington National since it has a separate terminal building removed from the airline terminal. Thus, making the general aviation quota more restrictive, as proposed in FAA's alternative B, would have no effect on the flow of passengers through the airline terminal buildings. In fact, removal of the quota constraints on general aviation likewise would have no effect on the flow of passengers in those buildings.

If the purpose of the quota is to reduce the number of aircraft operations, although this is not mentioned, then it would appear that the proposal to reduce general aviation's quota is misdirected. First, general aviation does not add materially to air congestion since most of the general aviation operations use runways 15/33 and 3/21. This enables general aviation traffic to more efficiently utilize both the airport and the terminal airspace. History has shown that general aviation can and does exceed its hourly allocation of 12 slots, sometimes by more than twice that figure.

While we speak of the 12 slots in terms of general aviation, the allocation in fact is to "other" traffic. This includes not only general aviation, but nonscheduled air taxi flights, the fleet of FAA and Coast Guard airplanes based at National and other civil government transient aircraft such as those operated by NASA and the state governments. If the FAA objective is to reduce air operations, then the first logical step would be to transfer the FAA and Coast Guard aircraft from National to either Andrews or Dulles. Other federal civilian aircraft operations should be required to use Dulles or BWI.

However, it would appear that the number of air operations is not the problem. The total number of aircraft operations at National in 1968 was 346,417. This declined for many years and it was not until 1978 that the total again reached this figure. For 1979 the total was 352,904 for a gain of only 1.9% in 11 years. During this period, air carrier operations fell from 235,039 to 207,112. Military operations also decreased from 3,254 to 396, while general aviation and air taxi increased. Meanwhile, improved ATC has increased the practical capacity of the airport. Thus, overall, capacity for airside operations is available and no constraint is necessary from this viewpoint.

Four factors are enumerated in the FAA Policy Statement under the "Role of Airports." One of the most obvious has been omitted. That is the growth of general aviation, which is not even mentioned.

Further, under this heading, the FAA boasts of a "modern international arrival and inspection facility" at Dulles. In fact, the international arrival facility at Dulles is a disgrace, as

anyone who has had to use it can testify. The baggage handling facilities are minimal, causing many delays to incoming passengers awaiting their luggage. The provisions for the public who are awaiting incoming passengers to clear customs are even worse. Smaller international airports around the world have better facilities. We comment on this aspect since general aviation people are frequent passengers on the airlines and must suffer through this bad arrangement.

Under the "Policy Objectives," it is stated that one is to eliminate unnecessary constraints on the use of aircraft at National Airport. The proposals for new rules at National would have just the opposite effect.

The FAA argument used concerning the number of air carrier slots being reduced to 118 is phony since it involves the alleged possibility that the airlines would schedule 40 operations at precisely 10:00 P.M. We would expect argument presented by the government to be more mature.

The FAA "concludes" that a curfew is warranted, but there is little, if any, substantiating evidence to support that conclusion, especially as an across-the-board curfew on all types of aircraft.

With regard to the proposed curfew, airline operations are the main source of noise. With the plans to permit the quieter wide-body aircraft to operate at National, this should alleviate to some extent the noise problem in that regard. However, the curfew would tend to compress airline passengers into fewer hours, thus increasing the hourly flow.

General aviation's smaller propeller-driven and quiet business jets do not produce the type of offensive noise that airport neighbors object to. A curfew to eliminate general aviation would gain little for the neighbors, but would do serious harm to interstate business and personal transportation. It would tend to compress all operations into fewer hours and thus increase the repetitive noise nuisance.

Under FAR Part 36, the general aviation fleet is becoming less noisy as more and more aircraft come into compliance with those standards. In the event that the FAA finds it absolutely necessary to impose some restrictions during the night hours, one alternative would be to allow only those aircraft which currently meet the standards set forth in FAR 36 to operate during the noise-sensitive night hours. Even then, the hours should not exceed a period from 11:00 PM to 6:00 AM.

The stage length for nonstop air carrier flights does not pose a problem for general aviation. It does appear, however, that the stage length restriction is nothing more than an artificial and meaningless constraint. If only a certain number of air carrier flights are permitted an hour, what difference does it make if they fly 400 miles, or 1,200 miles, just as long as it is the same aircraft? Again, this is nothing more than a means to try to force some flights to use Dulles instead of National.

Reference is made in the FAA notice that an NPRM would be issued in February on methods of allocating the slots. In the face of widespread objections, this did not happen.

The elimination of some air carrier slots will not "aid the FAA in controlling the growth at National" but will compress the passenger flow into 14 hours and constrain growth or deny service to those who otherwise might need to fly at other hours.

We are particularly concerned that any action taken by the FAA at Washington National Airport would set a precedent for other airport proprietors throughout the nation and could have serious effects on many operations that use the night hours to move essential cargo such as bank checks, mail, express packages and fresh foods across the country. The "domino" effect started at Washington could be disastrous not only for aviation, but for the public at large.

In summary, we recommend that general aviation be freed from quota constraints and that no curfew be applied to general aviation aircraft.

We appreciate the opportunity to present our views and will be glad to respond to any questions.

SUMMARY STATEMENT FOR HEARING JUNE 11, 1980 ON PROPOSED
RESTRICTIONS ON WASHINGTON NATIONAL AIRPORT

MY NAME IS VICTOR J. KAYNE. I REPRESENT THE AIRCRAFT OWNERS AND PILOTS ASSOCIATION WHICH HAS A QUARTER OF A MILLION MEMBERS WHO USE GENERAL AVIATION AIRPLANES FOR BUSINESS AND PERSONAL TRANSPORTATION. I AM A PRIVATE PILOT AND A LONG-TERM RESIDENT OF THE WASHINGTON AREA. I WAS THE CHIEF OF THE CONTROL TOWER AT WASHINGTON NATIONAL AIRPORT WHEN IT WAS OPENED IN 1941.

WE OPPOSE BOTH THE PROPOSED CURFEW AND THE PROPOSAL TO IMPOSE FURTHER RESTRICTIONS ON GENERAL AVIATION OPERATIONS AT NATIONAL AIRPORT.

THE EXISTING QUOTA WAS ESTABLISHED IN 1969 ON THE GROUNDS THAT UNDUE DELAYS WERE OCCURRING TO ARRIVING AND DEPARTING AIRCRAFT. THIS ACTION FOLLOWED A SLOWDOWN IN TRAFFIC HANDLING BY THE AIR TRAFFIC CONTROLLERS.

THE FAA NOW IS TRYING TO USE QUOTA RESTRICTIONS TO CONTROL THE NUMBER OF PASSENGERS PASSING THROUGH THE TERMINAL BUILDING, WITH THE OBJECTIVE OF DIVERTING ALL IN EXCESS OF 18 MILLION A YEAR TO DULLES AND BALTIMORE-WASHINGTON INTERNATIONAL AIRPORTS. NO OTHER RATIONALE HAS BEEN PROVIDED TO EXPLAIN THE 18 MILLION CAP ON PASSENGERS.

GENERAL AVIATION AIRCRAFT CONTRIBUTE NEITHER TO TERMINAL CONGESTION NOR TO LOUD JET NOISE. GENERAL AVIATION USES A SEPARATE TERMINAL AND ITS AIRCRAFT ARE BECOMING INCREASINGLY QUIETER UNDER THE PROVISIONS OF THE FEDERAL AVIATION REGULATIONS - PART 36 - WHICH HAVE ESTABLISHED NATIONAL STANDARDS FOR AIRCRAFT NOISE.

AIRLINE OPERATIONS AT NATIONAL, WHICH ARE THE MAIN SOURCE OF NOISE, HAVE DECLINED FROM A PEAK OF 235,000 IN 1968 TO 208,000 IN 1979. WITH THE PLANS OF THE FAA TO PERMIT WIDE-BODY AIRCRAFT, THIS MAY REDUCE EVEN FURTHER THE NUMBER OF AIRLINERS USING THE AIRPORT AND IT CERTAINLY SHOULD REDUCE THE NOISE.

THE GENERAL AVIATION QUOTA OF 12 OPERATIONS AN HOUR AT NATIONAL ACCOMMODATES NOT ONLY THE PEOPLE WHO USE PRIVATE AIRCRAFT FOR TRANSPORTATION, BUT ALSO THE FLEET OF FAA AND COAST GUARD AIRCRAFT BASED AT NATIONAL, AS WELL AS OTHER FEDERAL AND STATE OWNED AIRPLANES, INCLUDING NASA. IN ADDITION, NONSCHEDULED AIR TAXI OPERATIONS COME UNDER THE GENERAL AVIATION QUOTA.

IF THE FAA THINKS THAT GENERAL AVIATION OPERATIONS CAUSE CONGESTION, THEN IT WOULD APPEAR THAT THE FIRST LOGICAL STEP WOULD BE TO TRANSFER ALL FAA, COAST GUARD AND OTHER GOVERNMENT CIVILIAN FLIGHT OPERATIONS TO EITHER ANDREWS FIELD OR DULLES.

WITH REGARD TO THE PROPOSED CURFEW, GENERAL AVIATION'S SMALLER PROPELLER-DRIVEN AND QUIET BUSINESS JETS DO NOT PRODUCE THE TYPE OF OFFENSIVE NOISE THAT AIRPORT NEIGHBORS OBJECT TO. GENERAL AVIATION AIRCRAFT ARE GOOD NEIGHBORS. A CURFEW TO ELIMINATE GENERAL AVIATION WOULD GAIN LITTLE FOR THE NEIGHBORS BUT WOULD DO SERIOUS DAMAGE TO INTERSTATE BUSINESS AND PERSONAL TRANSPORTATION.

THE FAA HAS DEVELOPED NOISE STANDARDS FOR THE MANUFACTURE OF GENERAL AVIATION AIRCRAFT, AND WHILE THESE STANDARDS MAY APPLY TO FUTURE AIRCRAFT, THEY COULD BE APPLIED IMMEDIATELY DURING THE NIGHT HOURS AT NATIONAL AIRPORT TO ENSURE THAT NO UNDULY NOISY AIRCRAFT WOULD BE OPERATED DURING THE NOISE-SENSITIVE NIGHT HOURS.

WE HAVE FILED COMMENTS WITH THE FAA ON BOTH THE PROPOSED METROPOLITAN AIRPORTS POLICY AND THE SPECIFIC PROPOSALS FOR WASHINGTON NATIONAL AIRPORT.

THANK YOU FOR THIS OPPORTUNITY TO MAKE OUR VIEWS KNOWN.

STATEMENT OF
CAPTAIN JOHN J. RUDY
WASHINGTON AREA SAFETY COORDINATOR
AIR LINE PILOTS ASSOCIATION
BEFORE THE
SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
U. S. HOUSE OF REPRESENTATIVES
JUNE 11, 1980
WASHINGTON NATIONAL AIRPORT

Mr. Chairman and members of the Subcommittee, I am Captain John J. Rudy, the Washington Area Safety Coordinator for the Air Line Pilots Association. With me is Captain Lawrence A. Horton, who is the Assistant Washington Area Safety Coordinator for ALPA. Together, Captain Horton and I have more than 30 years of experience flying into Washington National Airport.

To aid the Subcommittee, I have attached to my prepared statement a copy of ALPA's response to the Federal Aviation Administration's recent Notice of Proposed Rule Making and Notice of Proposed Policy regarding Washington National Airport. I ask that our response be included in the record of today's hearing.

Our testimony today is an outgrowth of the frustrations we have experienced dealing with the FAA concerning its plans for National Airport. For over three years, we have reviewed all of the available information. On the basis of that

review, we concluded that the continuing growth of National Airport should be severely restricted and that two- and three-engine widebody aircraft should be prohibited from using this facility.

There are three basic questions that need to be considered in order to understand the basis for our judgments.

1. What is in the best interests of the local communities? Local problems include noise pollution, surface traffic congestion and possible damage from an aircraft accident?
2. Are there any realistic alternatives to mitigate the anticipated adverse effects of the FAA's proposals on local communities?
3. Is National Airport capable of accepting two- and three-engine widebody aircraft while maintaining what we in the aviation community call "an equivalent level of safety?"

Concerning our first question, ALPA believes very strongly that local residents have every right to have their reasonable environmental objections resolved. Allowing expansion of flights and passengers at National Airport by whatever "management growth techniques" the FAA uses, does not, in our opinion, effectively deal with the local objections.

It is impossible to predict precisely the degree of surface transportation and terminal congestion that would result if the FAA's proposal went into effect. For example, in discussing wide-bodied aircraft, the FAA's Notice of Proposed Rule Making states, "At National, these aircraft would carry between 200 and 275 persons." However, the FAA has certificated the McDonnell Douglas DC-10, for example, to carry up to 380 passengers. Do we really believe the airlines will limit seating in their wide-bodied aircraft to 275 passengers in these times of intense competition and need to cut costs?

Concerning the second question on possible alternatives to the FAA's proposal, we must point out that both Dulles International and Baltimore-Washington International are well-managed, first-rate airports that can safely and efficiently handle all current and proposed aircraft and accommodate future traffic growth. In our opinion, it is only logical that widebody flights and future traffic growth should be limited to Dulles and BWI. An integral part of future area transportation planning must be rapid transit facilities at Dulles and BWI.

The third question -- introduction of two- and three-engined wide-bodied aircraft at National -- is a delicate and complex issue.

It is delicate because the public could easily misunderstand our position and conclude that either the airport or a wide-bodied aircraft is unsafe. Neither conclusion is valid by itself. But we believe the combination of widebody aircraft and National Airport's restricted environment will mean an acceptable level of safety cannot be assured with reasonable confidence.

This issue is also complex because the FAA, the aircraft manufacturers and the airlines can provide impressive data demonstrating excellent aircraft performance under all sorts of conditions. However, we all must remember that only very seldom is a single factor or component failure the cause of an aviation accident. It is usually a series of problems that together lead to disasters.

Whether it is a sandstorm in the Iranian desert combined with a hydraulic failure or the unanticipated retraction of the leading edge slats after an engine separation on takeoff, it is clear "the best-laid plans of mice and men" do not faithfully adhere to the predictions of even the most respected engineers. Murphy's infamous law is still in effect.

Let me now be more specific concerning our apprehensions regarding wide-bodies at National. First, the public must understand that National Airport is not un-

safe. It is a well-managed airport that has compiled an impressive safety record over the years. Nevertheless, we must respect its physical and operational limitations.

Under adverse weather conditions such as snow, slush, ice, or heavy rain, the main runway, although almost 7,000 feet long, can be uncomfortably short. This runway also lacks the 1,000-foot overruns recommended by the FAA.

When the weather is bad, the river approach to the south down the Potomac over Georgetown, and Rosslyn is, in our opinion, one of the most difficult and demanding approaches in the United States. During an instrument approach to the south, the pilot may encounter unexpected rain squalls, low drifting clouds and shifting wind direction while he must continually descend and execute a series of low-level turns. It is hard to explain to a non-pilot just how demanding this approach can be.

Unfortunately, industry decision-makers who argue that the widebodies can use National safely because the narrow-bodies do so will probably be snug at home when the blizzards are blowing or the thunderstorms marching through. Only the pilots and you, the passengers, are left to cope with the unpredictable whims of nature.

Three years ago, ALPA asked the FAA to conduct thorough operational evaluation flights before any type of wide-bodied aircraft was allowed to use National Airport. We urged that these tests be conducted under adverse weather conditions for a realistic evaluation of aircraft performance. The FAA turned a deaf ear to our request. Instead, it seems to have assumed that the purely cosmetic demonstration flights of the A300 and DC-10 in the fall of 1978 provided sufficient evidence of their capability to use National Airport safely under all conditions. ALPA emphatically rejects that assumption.

Now I would like to describe in some detail an issue of particular concern to all pilots and passengers if wide-bodied aircraft are to use the airspace around National Airport.

This issue will affect all other aircraft that must share the terminal airspace. It is aircraft wake vortex and the hazards it can produce.

Wake vortex is a rapidly rotating cone of very turbulent air trailing from each wingtip. Every aircraft produces wake vortex. (See attachment 1.) The larger and heavier the aircraft, the larger and more violent is the vortex.

The hazards of wake vortex are very real, and they affect aircraft landing and taking off. In May of 1972, a DC-9 on a training flight crashed while landing at Fort Worth, Texas. The cause of the crash was the wake vortex from a DC-10 that had just landed on the same runway. The vortex was so strong it threw the DC-9 completely out of control at too low an altitude for the crew to recover.

Now let us relate wake vortex to the specific situation at National Airport. A widebody jet departing from National Airport will begin generating wake vortex as the nose wheel lifts off the runway. With a five-knot crosswind, the vortex from one wing will remain on the departure runway while the one from the other wing will be blown over the intersecting runway. (See attachment 2.) Thus, a hazard is created for aircraft using either runway.

After takeoff, the widebody aircraft will comply with noise abatement procedures and follow the established departure corridors, which are very confined. (See attachment 3.) It is understandable that local residents continually press for strict adherence to these noise abatement procedures.

Let us look at the recommended procedures for avoiding the wake vortex created by this widebody jet that has just taken off. We quote from the FAA's Turbulence

Avoidance Procedures:

"Departing behind a large aircraft: Note large aircraft's rotation point -- rotate prior to large aircraft's rotation point -- continue climb above and stay upwind of the large aircraft's flight path until clear of his wake. Avoid subsequent headings which will cross below and behind a larger aircraft. Be alert for any critical takeoff situations which would lead to a vortex encounter."

First, let us understand that an airline pilot does not have the option of rotating prior to a large aircraft's rotation point.

Second, a pilot at National Airport does not have the necessary maneuvering room, which is available at other airports, due to the noise abatement procedures and the very confined departure corridors.

Third, all aircraft will not have climb performance as good as a widebody jet's and thus will be unable to climb above or avoid headings that cross beneath the large aircraft.

It is worth reviewing findings from some FAA and NASA flight test programs to investigate the effects of wake vortex. In 1972, the FAA's National Aviation Facilities Experimental Center tested the DC-10, L-1011 and the Air Force C-5A wide-body transports. The tests showed the vortices of the DC-10 and the L-1011 were both more intense and longer-lived than the vortex of the C-5A. NASA flight tests the same year determined that the minimum safe distance for a DC-9 to follow a C-5A was 6.5 nautical miles. The FAA today requires 5 nautical miles as the minimum separation distance between these same aircraft.

This is the separation distance that would be used for air carrier aircraft following widebody jets at National Airport. It is interesting to note the Air Force has established 10 nautical miles as the minimum separation distance, twice the FAA requirement.

These separation standards apply to both arriving and departing aircraft. The hazards are essentially the same in either instance.

The FAA's recommended procedure for landing behind a large jet is to "stay at or above the large aircraft's final approach path -- note his touchdown point -- land beyond it."

It is possible to follow this procedure at Dulles or BWI because both have long runways. A pilot does not have this luxury at National Airport. If he were to attempt this procedure, he would extend his landing roll beyond acceptable limits.

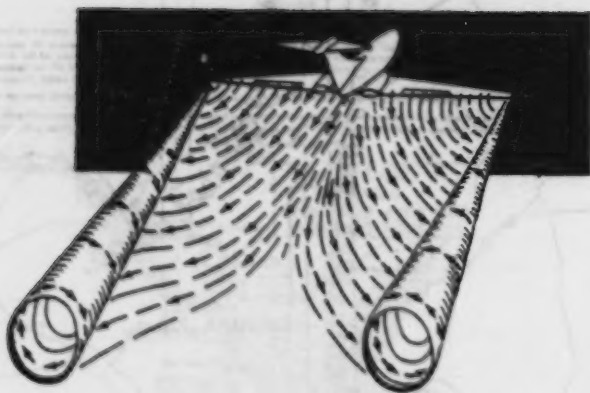
We believe the hazards associated with the invisible vortices from widebody aircraft in conjunction with the confined arrival and departure corridors at National Airport create unacceptable risks for pilots and passengers.

In summary, Mr. Chairman, if the FAA permits the use of widebody aircraft at Washington National Airport and some carriers elect to use them, the pilots will, albeit reluctantly, fly them as safely as possible in this restricted environment. However, we believe such a move will not be in the best interests of the public and the surrounding communities.

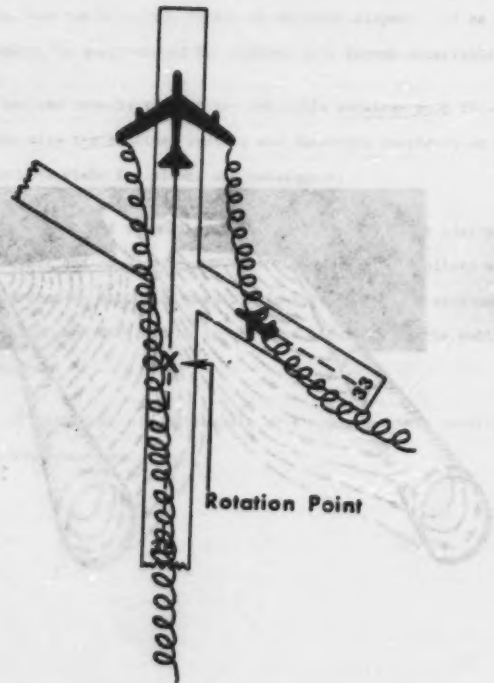
That completes our statement. We appreciate this opportunity to testify, and we will try to answer your questions.

ATTACHMENT # 1

AIRCRAFT WAKE VORTEX



AIRCRAFT WAKE VORTEX AT WASHINGTON NATIONAL AIRPORT



ATTACHMENT #3

TERMINAL AREA GRAPHIC NOTICE
(NOT TO BE USED FOR NAVIGATION)

Term-01

WASHINGTON NATIONAL AIRPORT NOISE ABATEMENT PROCEDURES
DEPARTURES

NET AIRCRAFT - From take-off climb to 1500', At 1500' reduce power to a target setting computed for hot day conditions at maximum gross take-off weight to give approximately 50% P/W climb. (In lieu of 1500' as the point of power reduction, the 2 mile DME fix* when departing northwest or southwest or the 3 minute power to normal climb settings. Follow the Potomac or Annapolis River routes described below unless otherwise advised by ATC.

ATC CLEARANCE TO "CONTINUE CLIMB" IN NO WAY ELIMINATES THE REQUIREMENT TO COMPLY WITH NOISE ABATEMENT PROCEDURES. EXCEPT THAT THE SPECIFIC ATC INSTRUCTION TO "EXPEDITE CLIMB" RELEASES THE PILOT FROM FURTHER COMPLIANCE WITH NOISE ABATEMENT PROCEDURES.

NORTHWEST - Potomac River to above Georgetown Reservoir thence continue over the river or via 323° Radial* until past the 10 mile DME arc.*

NORTHEAST - Annapolis River to the 5 mile DME fix*, continuing at reduced power past a 10 mile DME arc*.

SOUTH - Potomac River to the 5 mile DME fix*, continuing at reduced power past a 10 mile DME arc*.

(*Washington DCA VOR/DME)

1-AND 3-ENGINE PROPELLER AIRCRAFT - Follow Potomac or Annapolis Rivers as appropriate. From take-off climb to 1500' prior to turning on course unless instructed to turn earlier by ATC.

4-ENGINE PROPELLER AIRCRAFT - Follow Potomac or Annapolis Rivers as appropriate. From take-off climb to 2000' prior to turning on course unless instructed to turn earlier by ATC.

ARRIVALS

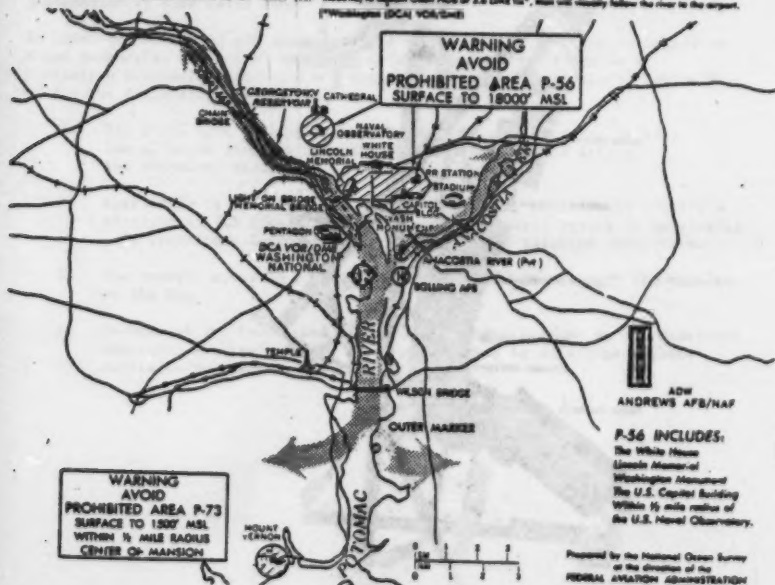
Aircraft shall be vectored so as to continue their approach over the river while being spaced within the traffic flow.

Aircraft making IFR approaches from the northwest shall be cleared for a River Approach (Visual) when weather is 3000' and 3 miles or better. Radar vectors will be provided to the final approach course. When cleared for a River Approach, aircraft may usually follow the river to the airport DME, then usually follow the river to the airport.

A light on Memorial Bridge is installed to assist pilots in timing over the Potomac River during approaches from the northwest.

Aircraft making IFR approaches from the south shall be cleared for a River Vector Approach (Visual) when weather is 3000' and 3 miles or better. When a cleared, aircraft will proceed inbound via 180° radial* (300° inbound) to align on Green HDS or 5.6 DME fix*, then will usually follow the river to the airport.

(*Washington DCA VOR/DME)



22 APR 1968

ATTACHMENT #4

WASHINGTON NATIONAL AIRPORT





AIR LINE PILOTS ASSOCIATION

1025 MASSACHUSETTS AVENUE, N.W. □ WASHINGTON, D.C. 20036 □ (202)797-4000

May 15, 1980

Federal Aviation Administration
Office of the Chief Counsel
800 Independence Avenue, SW
Washington, DC 20591

Attention Rules Docket, AGC-24 RE: Docket No. 19948; Notice No. 80-2
Docket No. 19950
Metropolitan Washington Airports

Gentlemen:

This is in response to the above-referenced notices proposed by the Federal Aviation Administration to, among other things, allow widebody aircraft to operate into Washington National Airport, increase the nonstop service restriction, and change the operating hours of Washington National Airport.

Our remarks concerning these proposals are predicated upon the present configuration and operating status of Washington National Airport and the surrounding area, and not upon improvements that are planned or could be implemented at some later date.

In order to understand and appreciate the Association's position in regard to these proposals, we feel it necessary to describe the deficiencies at Washington National Airport and how they relate to the proposals in Notice No. 80-2. The deficiencies are as follows:

1. The final turn and approach to Runway 18 requires turns at very low altitude close to obstructions in order to land within the touchdown zone.
2. Approaches to the north, in inclement weather, which would require a straight in ILS (the only ILS approach available) result in marginally safe operations during frequent crosswind and tailwind conditions.
3. The overrun areas do not conform to the 1,000 foot length recommended by the FAA.
4. In view of the Prohibited Area (P56) and obstructions in the departure corridor, a takeoff to the north accompanied by an engine failure continues to cause us concern.

5. Even though the vast majority of takeoffs and landings at DCA are over water, the marine crash fire rescue resources are severely limited. The airport is dependent on the adjacent harbor patrol with its inherent limitations in communications and resources.
6. Land side crash-fire-rescue facilities are marginal under present operating conditions and dependent to some extent on mutual assistance agreements with local governments.
7. Access to and egress from the airport in case of crashes just off airport property, in or past the overrun areas, are limited to two highly traveled roads. During periods of peak air traffic at DCA, 7-9 a.m. and 4-6 p.m., these roads are also heavily traveled by "rush hour" commuters to and from Washington, causing these roads to be virtually impassable for emergency equipment.
8. Under adverse weather conditions, runway lengths are marginal, at best, and when viewed with other deficiencies, e.g., overruns, navigation aids and obstacles, these runway lengths are seriously limiting.

Please note that these deficiencies directly affect the subject proposals and do not represent all the deficiencies at Washington National Airport.

In light of these deficiencies, the Air Line Pilots Association offers the following comments to the subject proposals:

1. We are opposed to any change in the current 650 mile nonstop-service policy. Our opposition to the proposed changes is based upon the following:
 - a. Longer-range aircraft would be carrying additional fuel, resulting in heavier takeoff weights which magnify the operating noise problem, engine-out problem and accelerate-stop problem.
 - b. Allowing additional long-range operations at Washington National, with the unused capacity of Dulles and Baltimore-Washington airports so readily available, not only increases the congestion at National beyond an acceptable level, but reduces the space for short-range operations. Reducing long-range operations would result in a lower noise profile of aircraft operations as well as better service for passengers requiring short-range air service.
2. Widebody two- and three-engine turbojet air carrier aircraft should be restricted to the use of Dulles or Baltimore-Washington Airports for the following reasons:

- a. The approach and departure procedures, to and from the north, at Washington National Airport are nonstandard and would lead to reduced operational safety during landing, especially under adverse weather conditions. This would increase the possibility of overruns and underruns into inadequately prepared areas.
- b. At National Airport, the obstacle clearance performance capability of aircraft during a takeoff involving engine failure depends upon maneuvering that could be a hazard to airport neighbors as well as passengers.
- c. The severe limitations of suitable marine rescue equipment and the present marginal availability of land rescue plans and emergency facilities lead to the conclusion that widebodied aircraft cannot be handled by the available facilities at Washington National Airport.
- d. The Association members flying widebodied two- and three-engine aircraft are concerned that operating these aircraft into Washington National could reduce the margin of safety below an acceptable level because the existing conditions cannot be adequately compensated for. These ALPA members are particularly concerned over the need to make a significant low altitude heading change while turning onto a short final approach segment to Runway 18. This turn depends upon unimpeded maneuverability and becomes difficult in adverse weather. High performance aircraft, particularly high inertia widebody aircraft, are pushed to operating limits by such a turn. This destabilized landing approach conducted in proximity to numerous obstacles is not prudent for widebody aircraft.

We are concerned that training procedures would not be able to compensate for the minimal runway length, lack of extended safety areas, nonstandard approach and departure procedures, and the other deficiencies at DCA.

In addition, on November 10, 1978 this Association wrote to Mr. James T. Murphy, Director, Metropolitan Washington Airports, outlining our concerns and requesting certain considerations and evaluations prior to any final approval of widebody operations at DCA. We have not yet received response from the FAA concerning this request.

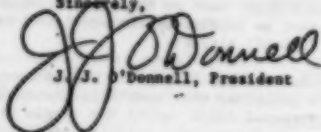
- 3. Our primary concern with the proposed change in the hours of operation is a fear that a "hard time" to end all operations could result in company, peer and personal pressure to complete the flight under less than optimum conditions. As you will recall, such pressure has been cited as contributing to several accidents when a crew was attempting to meet a hard curfew time.

In view of the Association's concerns, summarized above, the Air Line Pilots Association strongly recommends that the FAA:

1. Restrict the growth of Washington National traffic at this time.
2. Retain the present 8.0 mile perimeter limitations.
3. Refuse to allow two- and three-engine widebody aircraft to operate into Washington National.

Your consideration of these comments and recommendations is appreciated. Thank you for the opportunity to respond.

Sincerely,


J. J. O'Donnell, President

Mr. ANDERSON. At this time I am going to ask Mr. Fary to take the chair.

Mr. FARY. Mr. Philion, you may proceed.

TESTIMONY OF NORMAN PHILION, EXECUTIVE VICE PRESIDENT, AIR TRANSPORT ASSOCIATION; RICHARD HENSON, PRESIDENT, HENSON AVIATION, INC.; JOHN H. WINANT, PRESIDENT, NATIONAL BUSINESS AIRCRAFT ASSOCIATION; VICTOR J. KAYNE, VICE PRESIDENT, AIRCRAFT OWNERS AND PILOTS ASSOCIATION; BUD RUDDY, CHAIRMAN, WASHINGTON AREA SAFETY COMMITTEE, AIRLINE PILOTS ASSOCIATION, ACCOMPANIED BY LAWRENCE A. HORTON, COUNCIL 11 AIR SAFETY CHAIRMAN.

Mr. PHILION. Thank you, Mr. Chairman. Since you have entered our prepared statement into the record, I would like to briefly summarize three points concerning the FAA's Washington National proposal.

I appear today in behalf of the scheduled airlines of the United States, all of which have a deep interest in the question of local airport restrictions and their impact on interstate air commerce, but in particular, in behalf of 15 of our member airlines that serve Washington National Airport, with scheduled nonstop and direct service to 107 airports in 43 States.

The three points that I would like to concentrate on in our summary statement are, first, the proposal's effects on public service to the Nation's Capital. The second point involves modifications which we have suggested for a more flexible, practical approach in accord with reduction goals and the needs of the public for efficient, economical, and effective air transportation consistent as well with the Airline Deregulation Act.

The third point, Mr. Chairman, we would like to discuss briefly an expected FAA proposal for an auction system to replace the airline scheduling committee used successfully at National Airport to adjust airline schedules in order to meet the FAA quota established 11 years ago as a temporary restriction.

The airlines are trying to meet the demand for air service to and from National Airport in the most environmentally acceptable manner possible. Certainly fewer airline flights are being operated at National Airport today than in past years, and these operations are being conducted with quieter aircraft. Last year, for example, we operated nearly 12,000 fewer flights than were operated in 1972, and over 31,000 fewer flights than were operated in 1967.

Last year the airlines carried 94 percent of all of the passengers using National Airport, and yet airline flights accounted for just 59 percent of all aircraft operations at National Airport in 1979.

More public service flight reductions, however, are now being proposed by the FAA. If the rule being proposed had gone into effect today, the airlines would have to cut 17 percent of the flights scheduled to operate on June 11 to and from Washington National Airport. A total of 88 of today's arriving and departing flights at National Airport would have to be canceled, and an average of about 6,100 passengers would be displaced today, and every other day in the month of June.

These figures would jump next month, 19 percent fewer flights would operate in July than are now scheduled; 100 flights each day carrying an average of about 7,000 passengers each day would have to be canceled. Mr. Chairman, we think these are very significant figures.

There is and there should be a genuine concern about the impact on air service to Washington, if reductions of this magnitude are imposed. Can it simply be assumed that some or all of the canceled flights automatically will continue to serve the Washington area through other airports, or that the traveling public just automatically will accept service which it may consider to be less convenient? We believe that is a questionable assumption. We suspect that the overall amount of air service will be reduced, and some service will be lost entirely, if FAA's proposal is not modified.

We have suggested modifications which will reduce total operations at Washington National Airport, which will provide meaningful noise relief, and still assure members of the traveling public better opportunities for determining travel arrangements of their own choosing, rather than that of some Government body. We have suggested a more flexible quota system for Washington National Airport, under which a slightly higher number of airline operations would be allowed Monday through Friday during those hours when the ambient noise level is high, and a reduced number when it is low. Weekend operations when aircraft noise is more noticeable would be further reduced under this concept, the details of which are described in our prepared statement.

We believe our suggested modifications to the FAA proposal have merit, and we hope they will be given serious consideration.

Finally, a brief observation about the auction system under consideration by FAA. A precise evaluation of the feasibility and impact of such a system cannot be made, of course, until the FAA proposal is released. Clearly, however, an auction system at National Airport, in addition to existing landing fees, will cost the airlines and their passengers many millions of dollars annually. Moreover, it raises serious questions which should be of concern to all aviation interests and all aviation policymakers.

First, no showing has been made of any need to replace the scheduling committee, which has the virtue of having worked.

Second, there is no justification for replacing a proven system with one that may not work effectively, and will add significantly to the cost of air transportation.

Third, an auction system clearly would adversely affect short-haul small-community air service.

Fourth, an auction system at National Airport, even if successfully implemented, would inevitably affect flight operations at other airports for no valid reason.

Fifth, there are numerous questions as to the legal authority to establish an auction system, and to collect and dispose of the proceeds.

Finally, the auction system under consideration would introduce an airline economic regulatory mechanism which we believe would be more pervasive than that which Congress decided just 18 months ago to bring to an end. Any federally administered system having the inevitable effect of determining which short or longer

haul markets would or would not be served, which airlines would or would not operate, and the level and the cost of the service provided, clearly would be in conflict with the Airline Deregulation Act of 1978.

Mr. Chairman, we believe there is substantial public concern that the FAA proposal on Washington National Airport will adversely affect the availability and convenience of air service to Washington. We hope during the course of these hearings you will learn more about these concerns. We hope the subcommittee, as a result of this consideration, will take appropriate action to assure the continuation of adequate public service at Washington National Airport.

Thank you.

Mr. FARY. I thank you, Mr. Philion.

[The following was subsequently received for the record:]

Air Transport Association



OF AMERICA

1700 New York Avenue, N.W.
Washington, D. C. 20006
Phone

OUR NEW PHONE
NUMBER IS
(202) 636-6000

NORMAN J. PHILION
Executive Vice President

June 23, 1980

Honorable Glenn M. Anderson
Chairman
Aviation Subcommittee
Committee on Public Works
and Transportation
U.S. House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

This is in reference to my appearance before the Aviation Subcommittee on June 11 during hearings on the Washington National Airport Policy Proposal. Certain additional background material and requested supplementary information hereby are submitted for the record.

First, the prepared statement which formed the basis of my testimony referred to comments we filed early this year on the Polynomics study jointly commissioned by the CAB and FAA. The Polynomics study recommended an auction system to allocate airline slots. Our comments urged rejection of the recommended auction system because it was operationally unsound. As indicated in my prepared statement for the June 11 Subcommittee hearings, a copy of our comments on the study is enclosed.

Second, I was asked to supply information on the number of flights scheduled on Saturdays and Sundays from January 1979 through July 1980. The following reflects airline operations scheduled on Saturdays and Sundays during this period as the data on the total number of planned scheduled flights were submitted to the FAA each week by the Washington Airline Scheduling Committee:

<u>Month</u>	<u>Saturdays</u>	<u>Sundays</u>
January 1979	509	563
February	503	518
March	504	532
April	454	494
May	433	480
June	530	571
July	534	574

Honorable Glenn M. Anderson
June 23, 1980
Page Two

<u>Month</u>	<u>Saturdays</u>	<u>Sundays</u>
August	551	579
September	544	566
October	554	579
November	513	559
December	523	566
January 1980	520	576
February	490	557
March	484	553
April	487	548
May	534	568
June	545	567
July	565	598

In reviewing the above data in connection with the Saturday and Sunday variable plan suggested by ATA in its proposed modifications to the FAA Washington National Airport Policy Proposal, the following points should be noted:

1. Data filed weekly with FAA by the Airline Scheduling Committee do not include charters and extra sections actually operated, nor do they reflect differences between planned and actual scheduled operations if planned flights were cancelled due to operational conditions, including weather;
2. Planned scheduled operations were lower than normal during and subsequent to the 58-day major airline strike occurring during the period April - June 1979; and
3. Schedule planning at many airports, including Washington National Airport, was directly and indirectly affected during and subsequent to the 37-day DC-10 grounding in June - July 1979 as individual airlines found it necessary to shift scheduling resources to meet public demand.

The requested supplementary information concerning flights scheduled on Saturdays and Sundays is referred to on page 171, line 3950, of the transcript of the June 11 hearing. We would welcome the opportunity to provide any additional information requested.

Sincerely,



Norman J. Phillon

Attachments

Air Transport Association



OF AMERICA

PAUL R. IGNATIUS
President and
Chief Executive Officer

1709 New York Avenue, N.W.
Washington, D.C. 20006
Phone (202) 672-4166

January 15, 1980

Mr. Clark H. Onstad ←
Chief Counsel
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D. C. 20591

Ms. Barbara Clark
Director
Bureau of Domestic Aviation
Civil Aeronautics Board
1625 Connecticut Avenue, N.W.
Washington, D. C. 20428

Dear Mr. Onstad and Ms. Clark:

On October 26, 1979 you provided the Air Transport Association and its members the report of Polinomics Research Laboratories, Inc. entitled "Alternative Methods of Allocating Airport Slots: Performance and Evaluation" dated August 1979. You requested comments no later than December 14, 1979 but later extended this date to January 15, 1980 in response to our request for additional time.

Your transmittal letter accompanying the report reads as follows:

"It is our intent that this report focus public debate on the important airport access questions facing the national air transportation system including both slots and noise at noise capped airports. The CAB and the FAA are committed only to finding a solution to these problems; we are fully open to any and all meaningful proposals and it should be understood that the Polinomics Study does not represent views of either Agency."

We welcome this constructive approach and assure you that it is shared by our members. We hope that you and we may continue this objective search for answers to the entire range of airport access questions.

There are clearly very complex issues involved with no perfect solution in sight. I urge that we work together in a constructive effort to resolve the outstanding issues as best we can.

Our reply on behalf of Air California, Air Florida, Air New England, Alaska Airlines, Aloha Airlines, American Airlines, Braniff International, Capitol International Airways, Continental Airlines, Delta Air Lines, Eastern Air Lines, Evergreen International Airlines, The Flying Tiger Line, Hawaiian Airlines, Hughes Airwest, Northwest Airlines, Pan American World Airways, Piedmont Airlines, PSA-Pacific Southwest Airlines, Republic Airlines, Trans World Airlines, United Airlines, USAir, Western Airlines and Wien Air Alaska is enclosed. It contains a summary together with a more detailed analysis.

Mr. Clark H. Onstad and Ms. Barbara Clark

Page 2

January 15, 1980

We will be pleased to meet with you to resolve any questions you may have with regard to our comments.

Sincerely,

Paul R. Ignatius

Paul R. Ignatius
President and Chief Executive Officer

Enclosure

CC: Honorable Neil Goldschmidt
The Secretary of Transportation

Honorable Marvin S. Cohen
Chairman
Civil Aeronautics Board

Honorable Langhorne M. Bond
Administrator
Federal Aviation Administration

COMMENTS AND RECOMMENDATIONS OF THE AIR TRANSPORT
ASSOCIATION ON AIRPORT ACCESS INCLUDING THE REPORT OF
POLINOMICS RESEARCH LABORATORIES, INC. DATED AUGUST, 1979:
"Alternative Methods of Allocating Airport Slots: Performance and Evaluation"

Eleven years ago in our comments and testimony on the proposed High Density Traffic Airport Rule we deplored the antigrowth philosophy underlying FAA's approach to the congestion problems experienced in 1968. We believed then, and we believe now, that increased capacity, not regressive, artificial restrictions on service, is the right way to deal with congestion. In our response to the proposed 1968 rule we stressed that our support was based "upon the clear understanding that the rule be temporary and that it be accompanied by a carefully conceived, time-phased program to procure the airway and airport capacity which a healthy aviation industry demands."

It is the position of our members that the goals of our national transportation policy should be to provide the capacity needed: (1) to respond to valid public demand for service in a free competitive market, and (2) to permit scheduling flexibility uninhibited by constraints. This is the case at the majority of U. S. airports today. It should be the goal for all major airports serving the public.

RECOMMENDATIONS

We recommend the following steps to the Secretary of Transportation and the Chairman, Civil Aeronautics Board:

1. Enunciate a clear national policy of enhancing airport/airway capacity so that commercial air carriers can meet public demand through flexible scheduling, uninhibited by constraints. Give immediate consideration to a program of greatly increased attention to airport/airway capacity including appropriate accommodation of general aviation at less busy airports.
2. Reexamine the justification for the slot allocations established eleven years ago at John F. Kennedy, LaGuardia, O'Hare and Washington National Airports in the light of today's level of air carrier operations, air traffic control improvements and construction projects completed over the past decade. Slot allocations should be eliminated altogether, or increased as necessary.

January 15, 1980

3. Coordinate the several ongoing studies, including studies by the FAA, ATA and the General Accounting Office, and develop timely action plans based upon them. For this purpose, the Secretary of Transportation may wish to establish a "Discussion Group" of principals from Government and industry to provide a forum for continuing joint review and consideration.
4. Take no further action to impose quotas or other allocation techniques except after full analysis of the characteristics of each individual airport and its traffic patterns and consideration by the "Discussion Group" proposed above. In every case give first preference to solving airport problems, including problems at the airports covered by the High Density Traffic Airport Rule, by overcoming capacity constraints as fully as possible and by allowing the free competitive market to solve the problem by adjusting to cost and delay factors.
5. Continue use of the Airline Scheduling Committees for the present, recognizing their strengths and weaknesses, while the search for other workable methods continues. We do not see an economically or operationally sound alternative to the Committees in the near term, if the quotas are retained.
6. Reject the Polinomics Report because it is not operationally sound. The airlines are, however, prepared to cooperate with the Government and others in an overall examination of near and long term solutions to the problems of airport capacity and utilization.

Fundamental public policy questions relating to airport access are raised by the Polinomics Report. Their resolution will significantly affect the continued availability and growth of efficient, economic and convenient public air transportation. Finding the right answers demands the closest possible communication and coordination between the Government and the airline industry.

Prior to providing specific comments on the Polinomics Report, we believe it essential to focus sharply on the larger problems which should be addressed in the context of access to the nation's airports. The consultant was commissioned to undertake a narrow analysis of the present scheduling committee system and to explore alternatives involving pricing techniques. Although important, such an inquiry fails to address the basic problem.

BACKGROUND

The airlines have become an indispensable component of our national life. In 1979, over 300 million passengers travelled on the 34 U. S. scheduled certificated carrier members of the Air Transport Association. About 85% of all common carrier inter-city passenger miles is provided by commercial air carriers.

The outlook is for continued growth in demand for both passenger and cargo services. By 1990, FAA's latest forecast predicts over 500 million passenger enplanements -- up 65% over 1979. Cargo is forecasted to double -- from 5.2 million tons in 1979 to 10.4 million tons in 1990.

This vigorous growth curve will impact every facet of the air transportation system. Expansion in aircraft capacity is occurring in many ways. During the next decade, load factors (the percent of seats occupied on the average) probably will be 60 to 65%, -- compared to 55 to 60% in the late 1970's. The average number of hours each plane operates will likely rise from 8.3 hours per day in 1975 to 9.5 hours per day in 1990. New aircraft have wide-body configurations and are quieter, more fuel efficient and able to carry far more passengers.

Questions about system capacity limitations which may affect air service growth have, however, arisen. Congestion and delays at some of the nation's airports precipitated promulgation of the High Density Traffic Airport Rule by FAA in December 1968 ^{2/} and resulted in the establishment of the Chicago, New York and Washington, D. C., Airline Scheduling Committees as a means of achieving compliance with the quotas assigned to certificated air carriers by that rule.

In 1967 and 1968, important elements of the airport and airways system were unable to accommodate the demands of its users with reasonable efficiency. Public awareness of this situation was heightened by widely covered reports of extensive air and ground delays suffered by air carriers and other users. Concerned citizens -- including air carrier management -- pressed the FAA for a quick solution.

Declaring that other, longer range solutions would be developed in time, ("Long-run solutions are dependent upon the modernization and expansion of the airways system and airport development" ^{3/}) the FAA's immediate solution was

^{1/} Based on a consensus of financial analysts.

^{2/} FAR Part 93, Subpart K.

^{3/} Amendment 93.13, 33 FR 17896, December 3, 1968.

a mandated reduction in demand on significant parts of the system. This was accomplished by imposing quotas ^{4/} on the activity of various classes of users at five airports.

Eleven years ago in our comments and testimony on the proposed High Density Traffic Airport Rule we deplored the antigrowth philosophy underlying FAA's approach to the congestion problems experienced in 1968. We believed then, and we believe now, that increased capacity, and not regressive, artificial restrictions on service was the right way to deal with congestion. In our response to the proposed rule we stressed that our support was based "upon the clear understanding that the rule be temporary and that it be accompanied by a carefully conceived, time-phased program to procure the airway and airport capacity which a healthy aviation industry demands".^{5/}

1. THE PRIORITY NEED

Freedom of access to the airport system has become an even more important public issue as a result of deregulation of the airlines -- first in 1977 by a more liberal entry policy on the part of the CAB and, since 1978, as a result of enactment of the Airline Deregulation Act. Both the present Chairman of the CAB and his predecessor have expressed concern that the free market entry goals of the Act might be frustrated by airport capacity limits.

We share the concerns about these constraints and believe that the goals of our national transportation policy should be to provide the capacity needed: (1) to respond to valid public demand for service in a free competitive market; and (2) to permit scheduling flexibility uninhibited by undue congestion, delay, or other operating impediments. This is the situation today at the majority of U. S. airports. We strongly urge this goal for all major airports serving the public.

Attainment of this goal means there must be constant priority attention by the industry, by airport operators, and by Federal and local authorities to developing programs to enhance capacity where operational or environmental constraints exist or are anticipated. There are many tools now in being to accomplish this, but a more comprehensive and better coordinated effort is essential.

^{4/} Originally the FAA rule expired at the end of a year. It was renewed on an annual basis and made permanent in 1973.

^{5/} Comments of the Air Transport Association on Notice No. 68-20, Docket No. 9113, page 1.

Planning for airport improvements by local authorities, the airlines, and by FAA in the Airport Development Aid Program (ADAP), has been generally well performed. The air carriers also assist by preparing the Annual Survey of Airports which ATA provides to the FAA and airport operators. These surveys identify airport improvements deemed necessary by the airlines in order to assist the FAA and airport operators in establishing priorities. Recently, ATA members have launched a renewed comprehensive attack on a broad range of issues bearing on delay/capacity/access -- including both airside and landside improvements and future technology. We will share the results of this effort with the FAA to supplement its own extensive studies, including:

- "The New Engineering and Development Initiatives: Policy and Technology Choices", dated March 1, 1979.
- "Potential of Noncapital Methods and Their Implementation to Reduce Congestion and Save Energy at Major U. S. Airports", dated May 1979.

All of these efforts, and their implementation should be placed in a coordinated Government-industry setting, to assure a totally balanced approach to the acquisition of new knowledge and its practical application. It is our view that neither Government nor the industry acting alone will be able to produce the best total plans of action.

The Polinomics study was commissioned by the Government to analyze the Airline Scheduling Committee system and to explore alternative methods of allocating airport slots. Although it was a narrow study of one small part of a much larger problem, the Polinomics Report reaches the inescapable conclusion that no method of allocating slots is satisfactory.

In this period of continued growth in public demand, the increasing public dependence on airline service for essential inter-city transportation, and a more competitive airline environment, the underlying need demanding priority attention is:

- Airport and airway capacity adequate to serve the demands of the travelling and shipping public.

The overall objective must be a clear national policy to enhance airport/airway capacity so that commercial air carriers can meet public demand uninhibited by operating constraints.

2. REEXAMINATION OF SLOT ALLOCATIONS

In 1968, airport and airway congestion became so acute in Washington, D. C., New York and Chicago--for example four hour flights between New York and Washington--that bold new actions were required to ameliorate it. The airlines, large and small, foreign and domestic, met under discussion authority granted by the CAB to find ways to relieve this paralyzing condition.

While these meetings were in progress, the FAA adopted its High Density Traffic Airport Rule which established hourly limitations on the number of operations at the five most congested airports, John F. Kennedy, LaGuardia, Newark, O'Hare and Washington National. The rule assigned quotas to three types of users: certificated carriers, scheduled air taxis, and others (general aviation, non-scheduled air taxis, and government, including military).

The hourly limitation and quotas on operations as they exist today are as follows:

Airport	Hourly Limitations (Slots) ^{6/}				Hours During Which Applicable
	Air Carriers	Air Taxis	Other	Total	
John F. Kennedy	70 80	5 5	5 5	80 90	3PM to 4:59PM 5PM to 7:59PM
LaGuardia	48	8	8	60	6AM to 11:59PM
O'Hare	115	10	10	135	3PM to 7:59PM
Washington National	40	8	12	60	6AM to 11:59PM

Originally Newark Airport was included. It was deleted in October 1970, when some easing of demand and airport improvements obviated the need for such control.

The quotas in effect at the four currently controlled airports have not been changed since their inception. It is well to recall that the High Density Traffic Airport Rule was promulgated as a "temporary" measure pending enhanced airport/airway capacity.

^{6/} The number of slots has not changed since the rule became effective in 1969.

a. Safety is not an issue

Limitations on scheduled operations have never been and are not now required for safety reasons, as the original Notice of Proposed Rulemaking 88-30 clearly stated. The FAA procedures are devised to assure safe operations at all airports and there is no difference between the safety levels maintained at the large hub airports which do not have limits on scheduled operations and those that do have limitations.

b. Improvements to the Air Traffic Control System

The excessive delays in 1987-1988, which produced the High Density Traffic Airport Rule, were caused primarily by ground congestion resulting from inadequate procedures and hardware for controlling traffic. Since 1988, airport capacities have been increased by airfield construction, including new and/or extended runways, improved taxiways, expanded ramps and a myriad of additional sophisticated landing aids. During the same period, the FAA has substantially improved and expanded its traffic control systems and procedures among which are:

- Terminal Control Areas
- Terminal Radar Service Areas
- Updated Terminal Radars
- ARTS III
- Central Flow Control
- Severe Weather Avoidance Program

These developments in technology have resulted in a vastly improved system over that existing in 1988 when the quotas were established. The airport/airway facilities available in 1988, the inadequacy of which resulted in the High Density Traffic Airport Rule as an expedient, have been improved substantially.

In need of immediate action is revision of FAA's policy of allowing the general aviation fleet to have virtually unrestricted access to the same airport facilities that are essential to air carriers serving the public. Today, general aviation aircraft are utilizing a significant portion of the operating facilities at some airports. For example, 37% of all operations at Washington National Airport were by general aviation aircraft in 1978. FAA estimates that the general aviation fleet, which now numbers 183,000 aircraft, will grow to 397,000 by 1990--up 54%. Federal transportation policy officials should address the questions of whether some of these aircraft should be accommodated at other airports, and whether more reliever airports should be built or improved and appropriately equipped to accommodate them. In the next decade an adequate reliever airport system promises to be one of the most significant improvements to enhance capacity at major airports.

c. The Validity of Quotas

The quotas established in 1968 are not a reflection of the true airport capacity which is demonstrated by the number of daily operations actually handled. Significant technological progress has been made and total air carrier operations have not grown as rapidly as predicted in 1968. The Air Traffic Control System handles more traffic than the quotas permit. In reality, the quotas limit schedules and not operations.

Hence, with less air carrier activity at the controlled airports, and with some improvements in capacity, it appears illogical to continue, unchanged, limitations that were deemed necessary under markedly different conditions eleven years ago. To do so simply provides a disincentive to further enhancing capacity and improving service to the public.

Thus, we urge FAA to reexamine, at each of the four controlled airports, today's limitations with a view to eliminating the quotas altogether, or at least increasing them, where feasible.

We would like to assist in this reexamination, and to encourage such action we plan to file a petition for rule-making with the FAA in the near future.

3. GOVERNMENT-INDUSTRY COOPERATION

In addition to the FAA reports of March and May, 1979, and the Polinomics Report, the FAA has several other studies and tests underway to develop computerized techniques for allocating airport slots. Some are due to be tested this month with airline participation.

In addition, the General Accounting Office issued a report entitled, "Aircraft Delays at Major U. S. Airports Can Be Reduced," on September 4, 1978. This report proposed the use of peak hour pricing and/or quotas to reduce delay at high density airports and emphasized the need for properly equipped reliever airports.

A model outline for future evaluation of this and other related studies is contained in the November 16, 1978 letter from the Office of the Secretary of Transportation to the Director OMB and the Congress in response to the GAO Report. The DOT letter states:

"...However, prior to imposing strict quotas and/or peak hour pricing, we believe that an in-depth study should be made of all factors affecting high density airports. This study should include (1) system impact

on air carrier scheduling, (2) a review of the effectiveness of the present quota system in meeting the demands of all users, (3) operational/legal problem that would be encountered in assessing and collecting peak hour surcharges from users, (4) alternatives, if any, to quotas and peak hour pricing, (5) mechanics for establishing equitable quotas/peak hour prices, and (6) the impact of deregulation through 1985 on airport congestion, particularly with commuters filling the voids left by air carriers."

We applaud this enlightened approach, and we propose that the several ongoing studies dealing with increased airport/airway capacity and the specific problem of airport congestion merit the Secretary of Transportation's consideration of establishing a "Discussion Group" of principals from Government and industry to provide a forum for continuing joint study and consideration of rational solutions to these problems.

4. AVOID FURTHER QUOTAS

We have previously stated our view that the basic problem of enhancing airport/airway capacity must be given priority attention. The possibility of additional airports being placed under quota limitations, and the recent proliferation of proposed allocation techniques to handle the slots at the four presently controlled airports, are matters of grave concern to the airline industry.

Other more effective ways can be found to handle problems of congestion and excessive delay cost. On a day-to-day basis, the air traffic control system can cope with temporary peaks and weather related problems. New Terminal Control Areas can be established to prevent use of congested airspace by inadequately equipped aircraft and minimum general aviation landing fees not based on weight can discourage non-essential use of congested airports.

No further quotas should be imposed, or other allocation techniques considered, except after a full analysis of the characteristics of each individual airport and its traffic patterns by all of the parties of interest. The "Discussion Group" previously recommended would provide an effective forum for such an analysis.

5. THE AIRLINE SCHEDULING COMMITTEES

The airlines, during their 1988 congestion meetings, explored a number of suggestions in search of immediate relief. Among them were:

1. a clearing-house which would determine on a daily basis each carrier's exact expected departure time which could be revised voluntarily to reduce queuing.
2. a preplanned delay program combining the "first come, first served" principle with an "authorized priority list".
3. differential pricing to shift operations to off-peak hours.
4. scheduling committees, a concept similar to that which had been used by the international carriers for a number of years, particularly at European airports.

Of these approaches only the scheduling committee concept seemed likely to produce concrete immediate results, if it could be mutually agreed what the hourly limits should be at congested airports.

a. FAA High Density Traffic Airport Rule

Before an agreement could be reached on the proper hourly capacity at any of the affected airports, FAA adopted its High Density Traffic Airport Rule, reciting in the preamble and in other communications that it would look to the carriers to establish a forum (committees or other means) for achieving compliance with the rule.

b. Operation of the Committee System

From the outset, FAA envisioned voluntary action by air carriers and anticipated discussions and agreements as a means of complying with the quotas. In adopting the rule, FAA said:

"As indicated in Notice 68-20, it is anticipated that, subject to approval of the Civil Aeronautics Board, the air carriers can arrive voluntarily at decisions to reduce schedules so as not to exceed the total allocation established by this rule in the interest of efficient airspace utilization. Discussions among the airlines are proceeding pursuant to a CAB Order, and the rule as presently drawn contemplates that an agreement will be in force on the effective date of the rule, April 27, 1969."^{7/}

^{7/} Amendment 93.13, 33 FR 17896, December 3, 1968.

For ten years, the airline participants in the Airline Scheduling Committees have successfully adjusted their schedules to meet the air carrier quotas. Despite their divergent interests, the carriers have been able to make these adjustments and to certify to the FAA that for every controlled hour of every day for ten years the air carrier quota of FAR 93, Subpart K was not exceeded.

During these ten years, the airlines have accommodated many changes. For example: charter airlines increased activity; new foreign flag carriers began Chicago and New York Service; at least 14 carriers obtained Part 401 certificates to serve one or more of the high density traffic airports; recessions and booms in business occurred; route awards were generous, tight, then generous again; and, finally, greater competition was mandated by Congress in the Airline Deregulation Act of 1978. Through it all, the committees worked. New carriers participated and they obtained slots. No carrier ever challenged the legality of the committees. No carrier or, indeed, no citizen or Government observer, ever challenged the results of a committee working session. The record is clear: ten years of difficult and frustrating negotiations have been conducted without any allegation of impropriety.

In view of this experience, as long as quotas remain in effect and as long as no superior method of slot allocation has been demonstrated, the Airline Scheduling Committees should be permitted to continue.

6. THE POLINOMICS REPORT

From a reading of the CAB contract with Polinomics awarded on July 10, 1979, plus discussions with the authors of the Report, it is our understanding that the consultant's assignment was to analyze the economic efficiency and competitive behavior of mutual agreement committees, and to suggest alternatives based on pricing mechanisms for the allocation of scarce airport slots. They were not required to, and did not, develop a full operating system capable of installation and operation, nor did they address the many questions and operational problems which would face Federal authorities, local authorities, the airlines, or other participants, such as air taxis, in meeting quotas under such pricing mechanisms.

Herein lies the principal defect of the Polinomics proposal. It tends to be so conceptual and so lacking in operational specificity as to defy meaningful assessment. Further, the controlled experiments (using students, cards, and flags)--as well as Treasury bond auctions also cited by Polinomics--are so divorced from the practicalities of airline scheduling that they cannot be translated into practical scheduling terms. The consultant has acknowledged that the tests cannot be replicated based solely on the data in the Report.

Under the Polinomics concept, each slot in each hour at each controlled airport would be auctioned off every six months by means of sealed bids. The high bidders for the available slots would win the awards, paying the price of the lowest winning bidder.

At the conclusion of the auction, any carrier could apply to buy or sell a slot at whatever price the market would bear. This would be done anonymously, using a computer to receive and print the buy and sell offers. This "after market" is the proposed technique for cleaning up the loose ends of schedules remaining after the auction. In addition, there would be special auctions for "essential service to small communities" and for off-peak-hour slots. How these special auctions would work was not treated in the consultant's report. The Polinomics Report indicates that the proceeds of all auctions would be used to finance airport capacity expansion or subsidize off-peak-hour usage. It does not, however, state how or by whom this would be accomplished, nor does it address established airport expansion funding programs.

Much of the Polinomics Report is concerned with criticizing the Airline Scheduling Committee system, with many unsubstantiated assumptions, while it ignores many pertinent operational and legal aspects which do not lend themselves to the suggested auction system. For example:

1. The Polinomics Report states that the scheduling committee process does not permit correlation of multi-airport operations (city pairs). While such discussions are forbidden by the CAB, the results are not as adverse as the report suggests. This is because each airline participant is a scheduling expert who is fully knowledgeable of the meaning of each slot requested in terms of that airline's system schedule. For example, one current airline schedule requires that an arrival slot at LaGuardia must link up with a departure slot at that airport. It must also link with successive arrival and departure times at seven other airports, and provide connecting service to or from 13 other flights--along with related scheduling of flight crews, flight services, cargo, ramp services, periodic maintenance, etc. This knowledge of each committee participant is crucial to achieving meaningful results, and it simply cannot be duplicated in a controlled experiment of the kind undertaken by Polinomics.
2. The Polinomics Report condemns the committee system because it does not generate funds for capacity expansion. This is patently irrelevant. There was never any intent that this objective be reached by

scheduling committees, nor has there been any constraint on capacity enhancement at the four controlled airports due to the unavailability of funds for expansion. Moreover, airport expansion funding is a product of airline commitments and payments, together with the Federal AIAF program which is financed principally by taxes on airline users.

3. An auction system in most cases will favor the inherently more lucrative long-haul flights over the short-hauls, which are essential to a full range of public air services. The attached Exhibit I clearly illustrates the relationship of mileage and revenue.

Moreover, it ignores the importance of airline connecting service. In 1978, interline connecting passengers, who comprise a very significant percentage of the short-haul passenger load, numbered one of every three of the total passengers carried by the certificated carriers.

In the development of orderly service patterns, the airlines, through their scheduling techniques, have sought to accommodate the short-haul, connecting passenger. As a result, a large percentage of this class of travelers is handled at peak periods when auctioned slots would presumably be most valuable. Reference to Exhibit I dramatizes the auctioning disadvantage facing airlines which provide the basic short-haul, connecting service.

4. Closely related to unanswered questions about short-haul connecting service is the problem of preserving a level of service to small communities. For example, the Polinomics Report states that special small community auctions would be held--but it is not clear how these would be planned, what origins and destinations would be auctioned, who would be eligible to bid, whether subsidies would be paid, how slots for this purpose would be determined, or why they are needed. In fact, it is not clear why the auction concept becomes involved since under the Deregulation Act the CAB must determine what level of service is essential and arrange for such service.

5. The Polinomics Report takes no account of the special characteristics of international air services. It ignores completely U. S. commitments under international air transport agreements providing for foreign airline access to U. S. airports.

The "United States Policy for the Conduct of International Air Transportation Negotiations", dated August 21, 1978, states, with regard to U. S. airline operations abroad:

"Charges for providing airway and airport properties and facilities should be related to the costs of airline operations and should not discriminate against U. S. airlines."

It would be exceedingly awkward for the U. S. Government to espouse value-based charges at its international airports, such as charges contemplated in the Polinomics auction proposal, when its stated international policy strongly opposes such practices abroad.

6. Commuter airline service and general aviation were not specifically treated in the Polinomics Report. These rapidly growing elements of aviation have a significant impact at many of the nation's busiest airports. The very important questions as to whether or not they would participate in slot auctions in their quota category and, if so, at what price, have been ignored.
7. The Polinomics Report recognizes that an auction system must have adequate safeguards to prevent anticompetitive practices. The extent of safeguards and close surveillance that will be required to assure against frivolous bids to buy out slots at choice hours for resale or, bidding up the price to absurd levels, will entail a massive degree of direct Government involvement and control.^{8/}

^{8/} At a special briefing on December 11, 1979 at CAB headquarters the consultant expressed the view that there would be less Government involvement than today. This assertion is difficult to comprehend since Government participation today is limited to a Rule adopted by FAA and review and approval of carrier agreements by CAB.

8. The Polinomics Report makes no reference to the role that Federal and local agencies would play in developing ground rules for holding auctions, awarding slots, collecting funds, expending funds, determining essential services, and policing the system.

Unless the recommendations of Polinomics are included in a specific rule-making proposal, it is not possible to deal precisely with the legal issues that will be presented. It is, however, obvious that any proposal contemplating the sale of a right to use the airways or an airport and to spend the proceeds for any specified purpose raises a number of jurisdictional, constitutional and contractual questions which have not yet been addressed.

9. The Polinomics Report suggests that the cost of an auctioned slot on a per passenger basis might range from \$5.00 to \$10.50. Using a rough average of \$7.00 per passenger and the 1978 passenger volume at the four controlled airports during slot controlled hours, the amounts of money potentially involved would run into several hundred million dollars annually. At the four airports, this cost would approach the total landing fees paid by all airlines at all airports in the United States and, it would far exceed the Federal outlays for these airports today.

The Polinomics Report states that the proposed auction system would provide greater economic efficiency and thus lower prices to the travelling and shipping public. However, these new auction costs would have to be passed on to consumers, i.e., passengers and shippers. The price for air transportation would be increased significantly. For example, the current round trip fare from Washington to LaGuardia on the shuttle is \$102. Applying the \$7.00 average of the Polinomics' range of cost per passenger, per slot, the fare would climb to \$130. This is based on the \$7.00 charge on departure from National and the \$7.00 charge for the arrival slot at LaGuardia. The same fees would apply in the same fashion for the return trip. It is difficult to see how an auction system, which will substantially increase airline operating costs, can be expected to lower airline prices.

CONCLUSION

In light of the above comments, we can see no merit in proceeding with serious consideration of the Polinomics auction proposal. Nor do we see how Polinomics' second choice, a lottery concept, can be viewed as a viable alternative. With some 900,000 slots to be allocated annually at the four controlled airports, the sheer complexity of random allocation among carriers--hoping to bring order through a computerized after market--produces visions of a new bureaucracy imposed on the industry with even more Government involvement.

Fundamental public policy questions relating to airport access are raised by the Polinomics Report. Their resolution will significantly affect the continued availability and growth of efficient, economic and convenient public air transportation. Finding the right answers demands the closest possible communication and coordination between the Government and the airline industry.

Urgent action is required to improve airport capacity. It must receive priority attention. We stand ready and willing to work with others in this endeavor, and are prepared to cooperate with the Government in an overall examination of near and long term solutions to the problems of airport capacity and utilization.

PASSENGER REVENUE VALUE
100 SEAT AIRCRAFT - ALL SEATS SOLD

<u>MILEAGE</u>	<u>TOTAL REVENUE</u>	<u>MILEAGE</u>	<u>TOTAL REVENUE</u>
100	\$ 3,487	1400	\$16,879
200	4,720	1500	17,819
300	5,953	1600	18,723
400	7,186	1700	19,627
500	8,419	1800	20,531
600	9,359	1900	21,435
700	10,299	2000	22,339
800	11,239	2100	23,243
900	12,179	2200	24,147
1000	13,119	2300	25,051
1100	14,059	2400	25,955
1200	14,999	2500	26,859
1300	15,939		

BASED UPON CURRENT STANDARD INDUSTRY FARE LEVEL
SET BY C.A.B. EFFECTIVE THROUGH DECEMBER 31, 1979

Mr. FARY. Mr. Henson, do you wish to proceed?

Mr. HENSON. Mr. Chairman, thank you for the opportunity to present the views of the Washington National Commuter Air Carriers Association on the FAA-proposed plan for the future of Washington National and Dulles Airports. You have entered the full text of my written testimony for the record, and I will only summarize the key points.

In summary I would like to say first that we support the FAA proposal to increase the commuter slots to a minimum of 15 from its present 8.

Second, to obtain more accessibility to the airport, we urge the development of separate access and unused air space, and approach procedures for commuter-type aircraft using area navigation and microwave landing systems.

Third, we would urge FAA to allow commuter flights to operate 1½ hours before and after the curfew for the major air carrier schedules, in order that we can serve our commuting passengers.

Now as an example of our commuter problems, I would like to state that we, Henson Airlines, are the oldest commuter carrier operating out of Washington National Airport, starting in 1962. We were the first replacement for Allegheny in the small community airports. We started at Hagerstown in 1967, and Salisbury in 1968, by CAB order to relieve Allegheny of those markets.

We serve those markets into Baltimore-Washington International and Washington National Airports. Last year, 1 year ago, we replaced three major carriers in the Newport News, Va., market with service to Washington, Baltimore, and Philadelphia. This June, 1 year later, we will have more than 40 percent more seats per day in the marketplace in relation to Piedmont and Allegheny service at that airport.

We are starting service in the Shenandoah Valley Airport serving Staunton, Harrisonburg, and Waynesboro, Va., this September 15.

As an example of the need for additional slots for the commuter operations, we are unable to have any departures for Patrick Henry, a community of over 350,000 people, fairly heavily industrialized, between the hours of 3 p.m. and 9 p.m. We have had many calls from major concerns there that are very disappointed in this inadequate service during that time period. We also have no slots allocated for Shenandoah Valley Airport that starts in September, September 15.

As a feed carrier, we find that Washington National Airport is the airport of greatest demand. We think something must be done to defuse this situation. If we had connecting flights at Baltimore-Washington International Airport, we would not have such great demand for the Washington National market, so we urgently request that we be extended to at least 15 slots, and hopefully more later on for our services.

Thank you, sir.

Mr. FARY. Mr. Winant, do you care to proceed?

I, too, will give simply one or two high points of our prepared statement, if I may, in the interest of keeping the statement to briefest terms.

I am John Winant and I am the president of the National Business Aircraft Association. I would like to point out that my statement is given on behalf of the General Aviation Manufacturers Association and the National Business Aircraft Association.

NBAA represents business aviation in the United States. We have more than 2,000 member companies which operate aircraft of all types in the day-to-day pursuit of their business objectives.

GAMA is a national trade association representing 39 U.S. manufacturers of general aviation airlines, engines, avionics, and component parts.

These hearings come at a crucial moment, when we are increasingly disappointed and frustrated by the actions of the FAA and the Department of Transportation. After years of cooperative effort in developing acceptable aircraft noise standards, the voluntary expenditure of enormous sums of money, we are now faced with the quandary of the same DOT-FAA proposing to prohibit use of those same aircraft, all on the basis, as we see it, of political expediency.

Admittedly, these are strong words, but we hope our explanation will convince the committee that DOT's proposal is indeed not only political but is arbitrary if not arrogant. General aviation and business aviation, in particular, is extremely interested in what regulations are established for the Metropolitan Washington airports for four equally significant reasons:

One, Washington serves as the political focal point of the Nation with Presidential, congressional, and Federal agencies' actions, policies, and regulations drastically affecting the operations and decisionmaking processes of the country's business community. Such an influence demands that businesses have a continuous access to the Nation's capital in order to promote a healthy economic environment. For many companies this vital access is supplied principally by company aircraft.

Two, any action taken by the Federal Aviation Administration (FAA) in its role as proprietor of Washington National Airport (DCA) and Dulles Airport (IAD) will be mirrored by airports throughout the United States. This gives us grave concern.

Three, the proposed Washington airports policy addresses two critical issues which will have a significant influence on the health of our national air transportation system—airport environmental considerations and airport capacity limitations.

I would say parenthetically that we consider the policy proposal as seriously flawed in that capacity constraints are proposed to accomplish purely political-environmental compromises.

The DOT proposes now to shut down DCA at night. For more than 5 years, general aviation turbojet operators have done an excellent job adhering to the existing voluntary curfew between the hours of 11 p.m. and 7 a.m. More repressive regulation is not needed. A review of all the operations at DCA for February 1980 yields only four general aviation turbojet operations, that is less than one per week, outside the normal operating hours of the airport. We insist that the general aviation operators are good neighbors who have done an extraordinarily fine job of reducing the noise impact, at least their share of it, at DCA, and they do not

deserve to be arbitrarily punished with constrictive unnecessary regulations.

Currently, about 65 percent of the business aircraft fleet meets or is well below FAR 36 certification standards. Older aircraft are being retired and replaced with new-technology quieter aircraft or retrofitted with new quiet, more fuel efficient engines. Successful retrofit kits have been developed and are being installed on quite a variety of older turbojet aircraft such as the Jetstar, Saberliner, and BH 125. The general aviation turbojet fleet is getting very much quieter at a very fast pace.

There is absolutely no rational need to close National Airport at night. For years FAA has known that night aircraft operations at DCA are not objectionable as long as some control over the more adverse noise levels can be exercised. This is exemplified by turbo-prop and piston engine aircraft's unrestricted use of National around the clock.

The foundation for building a rational noise level control structure which is responsive to the needs of the community and the aviation users has already been laid by the FAA through its separate handling of propeller and turbojet aircraft in relation to the voluntary curfew requirement. NBAA believes that a more effective and reasonable approach to controlling DCA nighttime operations can be built upon this foundation through the establishment of noise level limits based on FAR part 36 noise levels. Aircraft which can be operated in compliance with the applicable FAR 36 noise levels should be permitted to use DCA at all hours. While this approach will not keep all aircraft from using the airport at night, it will insure that the primary motive of the proposed curfew is realized—that is, to reduce the environmental effects of National's operations through voluntary compliance by aircraft operators. The administration in our view fails to show, in either the proposed rule or the required environmental impact statement, that there would be any benefit to the community from a curfew of general aviation flights at National Airport. The curfew would be far more than a mere inconvenience, and in fact would impose an unnecessary burden on the community. It would eliminate possible options of users and force them into a more crowded time period.

I will, sir, terminate the statement at this point and say again that we deeply appreciate the opportunity to appear before the committee.

Mr. FARY. Thank you very much, Mr. Winant.

Mr. Kayne.

Mr. KAYNE. Thank you, Mr. Chairman.

With your permission I will summarize our statement.

My name is Victor J. Kayne. I represent the Aircraft Owners and Pilots Association, which has a quarter of a million members who use general aviation airplanes for business and personal transportation. I am a private pilot and a long-term resident of the Washington area. I was chief of the control tower at Washington National Airport when it was opened in 1941. AOPA opposes both the proposed curfew and the proposal to impose further restrictions on general aviation operations at Washington National Airport.

The existing quota was established in 1969 on the grounds that undue delays were occurring to arriving and departing aircraft.

This action followed a slowdown in traffic handling by the air traffic controllers.

The FAA is now trying to use quota restrictions to control the number of passengers passing through the terminal building, with the objective of diverting all in excess of 18 million a year to Dulles and Baltimore-Washington International airports. No other rationale has been provided to explain the 18 million cap on passengers.

General aviation aircraft do not contribute to terminal congestion. General aviation uses a separate terminal and its aircraft are becoming increasingly quieter under the provisions of the Federal aviation regulations—part 36—which have established national standards for aircraft noise. Airline operations at National, which are the main source of noise, have declined from a peak of 235,000 in 1968 to 208,000 in 1979. With the plans of the FAA to permit wide body aircraft, this may reduce even further the number of airliners using the airport, and it certainly should reduce the noise.

The general aviation quota of 12 operations an hour at National accommodates not only the people who use private aircraft for transportation, but also the fleet of FAA and Coast Guard aircraft based at National, as well as other Federal and State-owned airplanes, including NASA. In addition, nonscheduled air taxi operations come under the general aviation quota.

If the FAA thinks that general aviation operations cause congestion, then it would appear that the first logical step would be to transfer all FAA, Coast Guard, and other Government civilian flight operations to either Andrews Field or Dulles.

With regard to the proposed curfew, general aviation's smaller propeller-driven and quiet business jets do not produce the type of offensive noise that airport neighbors object to. General aviation aircraft are good neighbors. A curfew to eliminate general aviation would gain little for the neighbors but would do serious damage to interstate business and personal transportation.

The FAA has developed noise standards for the manufacture of general-aviation aircraft, and while these standards may apply to future aircraft, they could be applied immediately during the night hours at National Airport to insure that no unduly noisy aircraft would be operated during the noise-sensitive night hours.

We have filed comments with the FAA on both the proposed metropolitan airports policy and the specific proposals for Washington National Airport.

Thank you for this opportunity to make our views known.

Mr. FARY. Thank you, Mr. Kayne.

Captain Ruddy.

Captain RUDDY. Mr. Chairman, I am John Ruddy, the Washington area safety coordinator for the Air Line Pilots Association. With me is Capt. Lawrence A. Horton, who is the assistant Washington area safety coordinator for ALPA.

The committee already has a copy of our formal statement dealing with FAA's proposed plans for National Airport, as well as ALPA's written response to FAA's notice of proposed rulemaking that deals with this subject. A brief summary of key points seems appropriate.

First, we feel it essential that the reasonable environmental concerns of the surrounding communities be effectively resolved.

ALPA believes that the future growth of this facility should be severely restricted and the present 650-mile limit retained.

Finally, the introduction of two- and three-engine wide-body aircraft does not, in our view insure an acceptable level of safety either for the wide body flights themselves or for the wide variety of other aircraft forced to operate in proximity to the wake vortex hazards these heavier aircraft will generate. Captain Horton will explain our concern associated with wake vortex hazards. This explanation will be supplemented by portions of FAA and NASA films that graphically illustrate the problems we expect to encounter if the FAA permits wide body flights to operate at Washington National Airport.

Larry, will you review the material, please.

Mr. FARY. Without objection, the gentleman may proceed.

Mr. HORTON. Mr. Chairman, as Captain Ruddy has indicated, one of our particular operational concerns is wingtip vortex, and specifically wingtip vortex generated by wide body aircraft. Let me take just a few minutes to explain wingtip vortex, and why it is a concern.

Wingtip vortex is generated by all aircraft, and is created by air flowing around both wingtips. It is the most hazardous component of what is generally called wake turbulence. It begins at nose wheel liftoff on takeoff and continues throughout the flight and until nose wheel touchdown on landing. It can be visualized as counterrotating air tunnels trailing from each wingtip. The diameter of each vortex varies from 25 to 50 feet, with tangential velocities as high as 224 feet per second, or about 150 miles per hour. The strength and intensity of this vortex are a primary function of aircraft weight, with speed and shape of the wing as contributing factors.

In the interest of conserving time, I would like to show portions of an FAA film entitled "Caution, Wake Turbulence," which will briefly describe the invisible hazard, and it will show a two-engine aircraft and a larger four-engine jet flying close by a smoke generator. Please note, if you will, the vortex and sphere of influence of each aircraft.

Would you show the film, please.

[At this point the film was shown.]

Mr. HORTON. Mr. Chairman, we have just seen wingtip vortex. The size and strength of vortexes created by wide body jets are even larger than what we have just seen and will exceed the countercontrol capability of many aircraft.

Now I would like to talk about what happens to this vortex as it trails behind the aircraft. As it leaves the wingtip, it has the rather unusual characteristic of settling at about 400 to 500 feet per minute to a point approximately 800 to 900 feet below the flight path of the aircraft. It then tends to remain level at this point while very slowly dissipating.

When an aircraft is close to the ground, such as on takeoff or landing, this vortex will settle to ground level, then move outwardly at approximately 5 miles per hour. Weather conditions will affect its movement and persistence.

Let me relate this to Washington National Airport. A wide body jet taking off from Washington National will begin generating

vortexes as the nose wheel lifts off the runway on takeoff. With a 5-knot crosswind, one side of this vortex will remain on the departure runway while the other vortex will be blown over the intersecting runway, thereby creating a hazard for aircraft departing from either runway.

After takeoff, this aircraft will comply with noise abatement procedures and follow the established departure corridors. Now let us talk about recommended procedures for avoiding wingtip vortex created by this wide-body jet which has just taken off, and I quote from the published FAA turbulence avoidance procedure.

Departing behind a large jet, note large aircraft's rotation point. Rotate prior to large aircraft's rotation point. Continue climb above and stay upwind of the large aircraft's flight path until clear of his wakes. Avoid subsequent headings which will cross below and behind a larger aircraft. Be alert for any critical takeoff situation which would lead to a vortex encounter.

First, let me say that an airline pilot does not have the option of rotating prior to a large aircraft's rotation point, and second, with the noise abatement procedures in the very confined departure corridors established at Washington National Airport, a pilot does not have the necessary maneuvering room such as is available at other airports.

Third, all aircraft will not have the same climb performance as a wide body jet and thus will be unable to climb above or avoid headings that will cross beneath it.

Let me now show portions of a NASA silent film. It will show a DC-10 with powder being discharged at the left wingtip to visually display one of the two wingtip vortexes. Next we will see a DC-9 flying 5 miles behind the DC-10. The DC-9 will fly into the vortex generated by the DC-10. Then this same DC-9 flight segment as seen from the cockpit.

The next segment will be of a Learjet flying 5 miles behind the DC-10, and the Learjet will also encounter the DC-10 wingtip vortex. Then this same flight segment as seen from the Learjet cockpit. Please note if you will the control problems experienced by both aircraft. These aircraft oscillations are not pilot induced, but are the result of an encounter with wingtip vortex.

Would you show the film, please.

[At this point the film was shown.]

Mr. HORTON. This is a DC-10, one of the wide bodies proposed at Washington National Airport. This is the powder being emitted from the left wingtip. This is to depict the vortex on the left wingtip. The one on the right wingtip is invisible.

This is a DC-9, typical of air carrier jets now operating at Washington National Airport. Notice the control problems. Again, these are not pilot induced. This would be an exciting ride, whether as a pilot or a passenger.

This is the same flight segment as seen from the cockpit. The white powder you see is that powder being emitted from the left wingtip. Remember that the right wingtip also is creating vortexes.

This is a Learjet typical of business jets operating at Washington National Airport, and notice his control problems. You will notice he will fly up to the white powder in the center of the windstream. You might also notice on this next series that the aircraft will roll past the vertical before the pilot is able to recover. That would be

an exciting maneuver, both as a passenger and as a pilot, and for ground viewers who might see this over Rosslyn, Va.

In the film we have just seen, the DC-9 and the Learjet were following 5 miles behind the DC-10. This is the established FAA separation criterion, and the criterion that would be used at Washington National Airport. It is interesting to note that the U.S. Air Force has established a 10-mile separation under these same circumstances, or twice the FAA standard.

These same separation standards are applied to arrival and landing aircraft, and essentially the same problem exists. The published recommended FAA procedure for landing behind a large jet is "stay at or above the large aircraft's final approach path. Note his touchdown point. Land beyond it."

Now at Baltimore-Washington International Airport and Dulles Airport, this is possible because both have long runways, but at Washington National Airport the pilot does not have this luxury and would extend his landing roll beyond acceptable limits.

The Nation's airlines, at considerable expense, are conforming to clean air standards by introducing cleaner-burning engines. Although we applaud their efforts, the removal of smoke from jet engine exhausts has eliminated a tool used by pilots, that is, the ability to see and avoid wake turbulence and wingtip vortex.

In conclusion, we believe that the invisible hazards associated with wide-body jet wingtip vortices, in conjunction with the confined departure and arrival corridors at Washington National Airport, provide unacceptable risks to pilots and passengers.

Captain RUDY. Mr. Chairman, that was one area of particular concern to ALPA. Another one that is in our written presentation refers to our request for a period of over 3 years for a thorough operational evaluation of flights under adverse weather conditions to determine whether the wide-body aircraft could safely be maneuvered in the Washington area. We heard not a word from FAA. However, ALPA learned just last week that FAA had undertaken an evaluation of wide-body aircraft operations at Washington National Airport and had concluded that wide-body operations are acceptable. This was an internal FAA study, which only became available because a private citizen secured it through the Freedom of Information Act.

The FAA report relies rather heavily upon comparisons between New York's La Guardia Airport and Washington National. The report states in part:

Other operational experiences such as at La Guardia Airport, with the expressway approach to runway 31, and the river approach to runway 13, which are routinely used by wide-body aircraft in New York, confirms the general acceptability of Washington National approaches for use by wide-body aircraft.

We believe this comparison was superficial at best. FAA included copies of their La Guardia approach procedures to help support their rationale.

Since the La Guardia expressway approach to runway 31 is the only one that even approximates the low-level maneuvering characteristics of all the approaches that bring you down the river to Washington National, ALPA decided to use FAA's own accident records to compare the statistical risks that would be associated with the runway 31 La Guardia example that FAA utilized in its

study. The results were startling. An important thing to understand is that there is a very clear relationship between weather and the frequency of accidents in the approach and landing phase of flight. The poorer the weather conditions, the higher the accident rates.

Indeed, ALPA was able to demonstrate that if all appropriate factors were taken into account, FAA's comparison of the approach to runway 18 at National versus the approach of 31 at La Guardia would show the statistical accident risk at 18 at Washington National to be 471 percent greater than the risk at runway 31 at New York. That immediately suggests the question "How did you calculate this?" It is simple. Since FAA's studies demonstrate accident rates increase when the weather gets worse, it follows if the FAA permits one flight to land at airport A and another to land at airport B, but insists that the weather at airport B must be twice as good as at A, then assuming all other factors are equal, the accident rate probability at A will be higher because the weather is worse at this airport.

With this in mind, we looked at the lowest ceiling and visibility combination that FAA authorizes in its published procedure for landing on runway 31 at La Guardia, and compared it to the lowest ceiling and visibility combination that FAA permits the air carriers to use when landing on runway 18 at Washington. This is where the 471-percent-higher risk at Washington National comes from.

Thank you, Mr. Chairman. That concludes our comments.

Mr. FARY. Thank you very much, Captain.

Mr. Philion, in your testimony you say that if flights are reduced at National, service to the Washington area will undoubtedly be reduced, and some could be lost entirely. Are you saying that the demand of business and tourist travelers to Washington would dry up if persons were forced to use Dulles? Do you believe that passengers make their decision to come to Washington based on which airport they fly into?

Mr. PHILION. Let me respond with two comments. First, Washington National is clearly preferred by the majority of passengers coming to Washington, including those who use Dulles and Baltimore, in our opinion.

Second, you have to bear in mind that 20 scheduled airlines are now sharing the 40-an-hour limitation imposed at Washington National. If there were just 1 or 2 airlines, and the total operations were reduced from 40 to 36, then I think that airline or those 2 airlines would have a better opportunity for realining their schedules to assure minimum effects on public service. But with 20 airlines sharing that number of operations and serving 107 different airports to and from Washington National, it is going to be awfully difficult, particularly in the area of service to smaller communities and on short-haul routes, to just arbitrarily transfer that service to a far more distant airport.

A passenger is not going to want to fly a 35-minute or a 45-minute flight and then take 1 hour or 1 hour and 15 minutes to come into the city. We see some adverse effects on public demand to Washington if the FAA proposal is adopted as it is proposed.

Mr. FARY. In the opinion of the panel, is Federal management of the Washington airports the best way to manage these airports? What would be the advantages and disadvantages of, for example, changing to a federally owned corporation or a locally controlled airport authority? Either of you gentlemen may attempt to answer this.

Mr. PHILION. Let me start it off. I think like some of the witnesses this morning indicated, this is probably something that there is no snap answer to. We have not given it a great deal of thought. I would say this, that FAA as manager of those two airports, Washington National and Dulles, in our opinion is doing a very good job. We do not agree with them frequently on the regulatory aspects, but in terms of managing those two airports, we think they do a very effective job. We would like to think about your question a little bit more, though.

Mr. FARY. Do the panel members believe that it is proper for the Federal Government to impose restrictions which seek to develop a balance in the use of the area's airports? To state the same question somewhat differently, to what extent is the Government obligated to spend money to develop facilities at National to accommodate all passengers who wish to fly there?

Mr. PHILION. Taking your first question first, the short answer is no. We do not think the Government should be in the business of dictating what service is provided to what airport. We think this would be wholly in conflict with the philosophies, the principles of the Airline Deregulation Act. Yet we do have a problem here.

We have had a problem ever since the FAA imposed the high-density-traffic-airport rule some 11 years ago. There are four airports in this country at which operations of airlines, commuters, and general aviation are restricted.

We think there is a better way to achieve the goal of the FAA and the local communities in dealing with the noise problem in this area. We do not like to see restrictions of this kind imposed, because inevitably as they spread across the country they are going to adversely affect interstate air commerce. That is a real problem, and we think it ought to be considered by those of you who are involved in making policy in this connection.

Mr. KAYNE. Mr. Chairman.

Mr. FARY. Proceed, Mr. Kayne.

Mr. KAYNE. Thank you. I wanted to really respond to the first question you asked about the FAA operating in Washington National and Dulles Airports. On the general aviation side, and speaking for our particular portion of it, we think that there should be a better way to do this. There are a number of airports around the country, as has been testified to earlier today, that are operated by authorities which are comprised of local government entities having an interest in the airport or in the area. We would prefer to see that rather than the Federal Government operating, for example, Washington National, because when the FAA imposes certain restrictions at Washington National, as just outlined by Mr. Philion, this establishes a precedent for other airport managers around the country saying if the FAA can do it at Washington, we can do it somewhere else. And looking at just the matter of the curfew, the curfew, if it is carried across the country, pretty soon

gets involved with time zones, and overall if you put a curfew on every airport in the country, very soon we would have only a few hours of operation at each, because you could not take off from one in a noncurfew hour and be able to land at another one in a noncurfew hour, so we think that the FAA in their operation of the air traffic system and their regulatory capacity is one thing, but it is all too easy in this airport operation situation to be setting by with what is bluntly called a bad example or a precedent for other airport managers, and in that respect we would rather see the FAA out of the business of operating these airports.

Thank you.

Mr. FARY. Do any of you other gentlemen wish to speak?

Mr. WINANT. I would like to, if I may, Mr. Fary.

As to the first question, that which was directed toward the type of management that might pertain at the two airports, my pragmatic side says to me that unless the Federal Government is willing to make a gift to some local entity or to a quasi-government corporation of the two airports, that this would never be realized. The amount of moneys already sunk into those two airports is tremendous, and I think in today's climate of retrenchment on the part of local, county, and regional governments, that the enthusiasm of purchasing those two airports at anything near a fair market price is just out of the question, and therefore I think that the Federal Government probably is going to remain the proprietor and the operator of the airports.

I agree with Mr. Philion and with Mr. Kayne that the quality of management offered at those two airports appears to be of a very high level, and that the FAA is frankly to be commended for running two good airports.

As to your second question, that which involves the possible imposition of restrictions so as to fine-tune and balance traffic at least at the two federally owned airports, it would seem to me that once an entity has been given the responsibility to operate a transportation facility, it then takes on the concomitant responsibility of maximizing the quality of service offered in terms of facility and parking and access, and it takes on the responsibility of providing a level of service that is responsive to the users, and I for one take great exception to the Federal Government attempting to one more time constrain activity.

I think all of us in the aviation community in recent months have been extremely upset, deeply concerned over Department of Transportation and FAA attitudes that the time has come to constrain growth, and to manage growth rather than to be responsive to the transportation needs as expressed by the people who travel, and I think the responsibility rests squarely on FAA's shoulders to maximize use of National Airport rather than to talk of continued quotas.

What was true 11 years ago is not necessarily true today in terms of the capacity of a system to handle operations. It should not be true, and therefore my answer to the first question is that it seems to me that the realism of the situation is going to dictate continued Federal ownership of the airports, and that the powers which control the Federal apparatus, specifically the Congress, and you gentlemen in particular in my view ought to give every consid-

eration to directing that the Federal Government do the best job it can in tailoring operations at those airports to meet the real needs expressed by the traveling public.

Mr. FARY. Thank you.

Are there other comments?

Captain RUDDY. Yes, Mr. Chairman.

In reference to the first question, I think the pilots feel that Washington National, Dulles and Baltimore-Washington International are all very well managed facilities. Washington National has serious operational limitations, the physical limitations of the airport itself, but it is a well-managed facility.

We would suggest that if a move were made to divest Federal interest in the airport, then the concerns of the various communities might not be as well served, because a local community could reflect a more parochial view in what they did. It is difficult enough for the FAA being a Federal agency. It would be that much more difficult for the understandable concerns, environmental concerns of all the surrounding communities to be dealt with, if only one small jurisdiction had authority.

Mr. FARY. I thank you, Captain.

The next question any of you may answer.

Mr. Henson.

Mr. HENSON. Mr. Fary, may I answer one of your questions, please, sir?

Mr. FARY. Without objection, go right ahead.

Mr. HENSON. I would appreciate responding to the question of balancing traffic. We feel that the Government must decide if it wishes to give service to the small communities. Then if it decides it does wish to give service to the small communities that have lost service due to deregulation, it must decide how and where these connecting flights will be made. At the present time the great frequency of major carrier flights at Washington National makes that a real demand for service at that airport, so we feel it is awfully important to address that problem. Otherwise we, the commuters, cannot serve these outlying areas.

Thank you, Mr. Chairman.

Mr. FARY. The next question was a general question addressed to the panel. Either or any of you may answer this.

Do the panel members believe that noise levels from current operations at National are unacceptable? If so, what steps should be taken to reduce noise? Do you have data indicating that your proposal would reduce noise to an acceptable level?

Mr. PHILION. I suppose you could get, Mr. Fary, as many answers from as many people on what constitutes an acceptable noise. As I pointed out in my comments, the airlines certainly have reduced the number of flights they operate annually over the last 10 or 12 years, significant reductions in aircraft operations.

Second, aircraft today certainly are quieter than those that operated 8, 10, 12 years ago, and we certainly hope they will be quieter even more in the future. We worked with you as you well know on not only the noise legislation but the airport and airway reauthorization legislation, and we are extremely hopeful that more quieter aircraft will be coming on stream shortly.

Now as to the acceptable level of noise, we think the modifications that we, the airlines, have suggested to the FAA proposal will result in noise reductions probably more meaningful than the measurement or the so-called measurement FAA uses to establish noise levels for incorporation in its environmental impact statement, particularly with the reductions on Saturdays and Sundays and in the early morning and late evening hours. We think there can be meaningful noise relief in this way.

Mr. WINANT. I would like to comment on that, sir. Back in 1969 the Federal Aviation Administration first issued a set of noise criteria governing the process of certifying aircraft, and these criteria are embodied in FAR part 36. There have been something like seven major amendments to FAR 36 during the past decade, and there now are in existence what are known as stage 3 noise levels indicating a third major reduction in the amount of noise that can be generated by FAR newly manufactured aircraft over those that were in existence in the 1960's.

It seems to me the answer to your question lies in FAR-36. If the Federal Aviation Administration, in whom Congress has vested the responsibility for controlling aircraft noise at the point of manufacture, has established what it feels are the lowest achievable noise levels, then that level has got to be accepted by the citizenry as an acceptable noise level. If that is not the case, then I think the Congress has to give some other direction to the FAA. The Congress mandated the reduction of emissions from automobiles, and the automobiles that are now equipped with those emission-control devices are free to use the highways. The Congress mandated the EPA to come out with controls on such devices as trucks, and trucks which meet the specs are allowed to use the Federal highway system, and to my best belief the highways in Alexandria, that is, the principal routes, at any hour of the day or night, and it seems to me that it is not consistent that FAR-36 noise levels are not accepted as those prevailing as the latest and most achievable in terms of technology and all the other reasonings, including safety of operation. And therefore I would urge that FAR-36 be recognized as an acceptable community level not only by the citizenry but by the FAA itself.

Mr. FARY. Thank you.

Mr. PHILION, I would appreciate any comments which you and other members of the panel may have in response to the concerns raised by ALPA about the safety of operations with wide-body aircraft at National.

Mr. PHILION. Well, with all due respect to my colleagues from the airline industry, I think I will restrict my comment to a review with you of what it is FAA is proposing, and our position on that proposal. In its proposed policy statement, FAA said:

The final decision on their use—that is, wide body use—by any particular operator will reside with the director of metropolitan Washington airports. That decision is to be made after an evaluation of the requesting air carrier's proposed operating plan, and will be based upon the proposed operation's compatibility with the airport facility.

The airline industry position on that proposal is as follows: The airlines endorse the FAA proposal that two- and three-engine wide body aircraft be permitted at National Airport, provided the airlines demonstrate the ability of these aircraft to operate into and

out of the airport and the capability of the airport to accommodate such aircraft.

Mr. FARY. Any other comments, gentlemen?

Mr. HENSON. Mr. Fary, I would just like to say that commuter aircraft do have a flexibility to operate in that environment, so it is not a concern of our type operations.

Mr. FARY. The next question is, Do the members of the panel agree with the suggestion in APA testimony that passengers per flight should be the main criteria used to allocate slots at National between the different classes of operators? Any of you gentlemen?

Mr. KAYNE. Mr. Fary, I would like to comment on that. If I understood the question or the recommendation correctly, that the number of passengers on a flight would be the criterion for allocation of a slot or not allocating a slot to that particular flight, this soon revolves into a contest of who can fly the biggest airplane into the airport with the most passengers on it. They then obviously would have a first choice or get all the slots or as many as practical.

Under that I think the business aircraft operator who is bringing the president of a corporation or the chairman of the board to Washington would not stand a chance of getting a slot. The commuters would be left out. The rest of general aviation would be left out. I know of no other form of transportation where we allocate you might say the resources based on the size of the vehicle and how many passengers it can carry. It also would have an odd effect on an airplane that carried no passengers, but was carrying freight. They would not be able to get a slot. So we completely reject that proposal.

Mr. FARY. Mr. Philion.

Mr. PHILION. Mr. Fary, may I comment on your question about our suggestion? I think our suggestion was not with respect to a passenger standard or guideline, but rather that when there is a constrained or scarce resource and whether we like it or not, that kind of a condition is going to exist, limitations or restrictions that are imposed on its use ought to be done in a way that does the greatest good for the greatest number. It might be passengers, it might be mail, it might be freight. Whether we like it or not, there are going to be conditions when there are scarce resources that have to be limited, and in such cases we are simply urging that every effort be made to do the greatest good for the greatest number.

Mr. FARY. Any other comments, gentlemen?

Mr. HENSON. Yes; Mr. Fary, the commuters would reject that proposal.

Mr. FARY. Mr. Winant, you suggest that nighttime operations be permitted by aircraft that meet FAR-36 standards. By this do you mean general aviation jets which meet the standard, or are you also proposing that large commercial turbojet aircraft, those in excess of 75,000 pounds, be allowed to use the airport at night?

Mr. WINANT. My comments were addressed to general aviation aircraft. I do not have competence to address the situation with regard to the larger turbine aircraft. They are not included in my constituency, and I am technically not competent to speak to that.

Mr. FARY. Do any of the other gentlemen wish to comment on it? If not, here is a question for Mr. Henson or Mr. Philion.

The FAA's proposed policy would group all carriers of the commuter category if they operate with less than 56 seats. You state that as a result, even though the commuter slot allocations are increased, there will be more carriers competing for these slots. Could you tell me which carriers would be shifted to the commuter category under the policy, and what type of aircraft are involved? Any of you gentlemen, Mr. Henson, Mr. Philion, or anybody else.

Mr. HENSON. Thank you, Mr. Fary. At the present time there are some commuters that are certificated that are operating in the major air carrier slots. Under the new proposal, these commuters would be moved back from the major air carrier 40 allocation slots into our slots.

Now what this will do when we request going up to 15 slots per hour, we will automatically relieve the major air carriers of some of their present operations that are being done by commuters because they became certificated, so actually we will not be gaining as great an edge in serving these communities as it would appear going from 8 to 15, but at least it is a step forward, so we will accept all air carriers that are operating 56 seats and under, under these new proposed slot allocations.

Mr. FARY. Mr. Philion.

Mr. PHILION. Mr. Fary, let me first respond by saying that the scheduled airlines wholly agree that the commuter airlines should be given additional slots. We see this industry as an important and essential part of the total air transport system, and we endorse that.

We also support the FAA proposal to redefine the category on the basis of 56 seats. I would point out that there are two commuter carriers that will shortly be jumping into the 78-seat category, and so they are going to continue to be in a scheduled airline quota.

Finally, one additional point. As I indicated, we fully endorse the need for more commuter airline slots. In its the background information, FAA says something has to be done in this area because of the importance of maintaining service from Washington National to some of the smaller communities and medium-sized communities. I would point out for the record that the scheduled airlines, who FAA proposes to reduce, operate more service to more smaller communities on a regular day-in, day-out basis than any group of commuter airlines. We have one scheduled airline at Washington National that by far operates more small-city, small-community service than all of the commuters combined, and I only mention it so that the subcommittee will bear in mind that the scheduled airlines who are threatened to be cut back are providing a great deal of small-community service.

Mr. FARY. Any other comments?

The one final question that I have before I ask the counsel if they have anything, Mr. Henson, you now have some experience with the Dash STOL-7 aircraft at National Airport.

We have been advised that the Dash-7 requires only a relatively short runway. Does your experience with the Dash-7 suggest that

these operations should not count toward the hourly computer allotment?

Mr. HENSON. Yes, sir, Mr. Fary. We feel very strongly that a development is occurring whereby we will prove in use that this type of equipment with the proper avionics gear in it, with unused air space entry, microwave landing system, we can land on runways 33 and 21, stopping regularly before the intersection and, hopefully, with this type of equipment, obtain frequency into Washington National for those communities outside the slot limitation.

We are concentrating that effort and we believe the FAA will back us in this concentration and, hopefully, prove that this is one way of giving better service to the small communities without hurting other operations.

Mr. FARY. Counsel, do you have any questions?

Mr. Anderson?

Mr. ANDERSON. Would ATA's proposal result in any reduction in actual operations on weekends? Now, we have received testimony that although ATA proposes 534 air carrier slots for Saturday and 584 air carrier slots for Sunday; the actual operations in January 1979 were 496 slots on Saturday and 555 slots on Sundays, which would mean a rather large increase, according to our new proposal.

I would appreciate your comments on the testimony.

Mr. PHILION. Mr. Chairman, it would mean a reduction.

Let me give you two examples: Under our proposal, Monday through Friday, I am sorry, were you talking about Saturday or Sundays?

Mr. ANDERSON. Saturdays and Sundays.

Mr. PHILION. Saturdays. Under our proposal, the airlines would be reduced to 534 flights on a Saturday, and Saturday in June we are operating 562.

Mr. ANDERSON. In January you were operating 496?

Mr. PHILION. In July, 616. There will be a significant reduction in flight operations under our proposal.

Mr. ANDERSON. Sunday you are proposing 584 in January, you were using only 555, and that would be an increase of about 30.

Mr. PHILION. Sunday in the month of June we are operating 567. In the month of July, 612. There will be a sizable reduction.

Mr. ANDERSON. Explain the difference between January and June. Is there a great seasonal difference?

Mr. PHILION. I can't recall what the situation was in January.

Mr. ANDERSON. I have your figures here.

Mr. PHILION. What caused it, I can't say.

Mr. ANDERSON. You should prepare for the record then a month-by-month breakdown. I would like to know what you used in January and February and March, so we can make these comparisons on both Saturdays and Sundays, so we can be talking about the same thing.

Mr. PHILION. We will give them to you for the months of January through July.

[The information follows:]

Air Transport Association



OF AMERICA

1700 New York Avenue, N.W.
Washington, D. C. 20006

Phone **ONE NEW PHONE**
NUMBER IS
(202) 626-4000

NORMAN J. PHILLION
Executive Vice President

June 23, 1980

Honorable Glenn M. Anderson
Chairman
Aviation Subcommittee
Committee on Public Works
and Transportation
U.S. House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

This is in reference to my appearance before the Aviation Subcommittee on June 11 during hearings on the Washington National Airport Policy Proposal. Certain additional background material and requested supplementary information hereby are submitted for the record.

First, the prepared statement which formed the basis of my testimony referred to comments we filed early this year on the Polynomics study jointly commissioned by the CAB and FAA. The Polynomics study recommended an auction system to allocate airline slots. Our comments urged rejection of the recommended auction system because it was operationally unsound. As indicated in my prepared statement for the June 11 Subcommittee hearings, a copy of our comments on the study is enclosed.

Second, I was asked to supply information on the number of flights scheduled on Saturdays and Sundays from January 1979 through July 1980. The following reflects airline operations scheduled on Saturdays and Sundays during this period as the data on the total number of planned scheduled flights were submitted to the FAA each week by the Washington Airline Scheduling Committee:

Month	Saturdays	Sundays
January 1979	509	563
February	503	518
March	504	532
April	454	494
May	433	480
June	530	571
July	534	574

Honorable Glenn M. Anderson
June 23, 1980
Page Two

Month	Saturdays	Sundays
August	551	579
September	544	566
October	554	579
November	513	559
December	523	566
January 1980	520	576
February	490	557
March	484	553
April	487	548
May	534	568
June	545	567
July	565	598

In reviewing the above data in connection with the Saturday and Sunday variable plan suggested by ATA in its proposed modifications to the FAA Washington National Airport Policy Proposal, the following points should be noted:

1. Data filed weekly with FAA by the Airline Scheduling Committee do not include charters and extra sections actually operated, nor do they reflect differences between planned and actual scheduled operations if planned flights were cancelled due to operational conditions, including weather;
2. Planned scheduled operations were lower than normal during and subsequent to the 58-day major airline strike occurring during the period April - June 1979; and
3. Schedule planning at many airports, including Washington National Airport, was directly and indirectly affected during and subsequent to the 37-day DC-10 grounding in June - July 1979 as individual airlines found it necessary to shift scheduling resources to meet public demand.

The requested supplementary information concerning flights scheduled on Saturdays and Sundays is referred to on page 171, line 3950, of the transcript of the June 11 hearing. We would welcome the opportunity to provide any additional information requested.

Sincerely,



Norman J. Philion

Attachments

Air Transport Association



OF AMERICA

1700 New York Avenue, N.W.
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PAUL R. IGNATIUS
President and
Chief Executive Officer

January 15, 1980

Mr. Clark H. Onstad ←
Chief Counsel
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D. C. 20591

Ms. Barbara Clark
Director
Bureau of Domestic Aviation
Civil Aeronautics Board
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Dear Mr. Onstad and Ms. Clark:

On October 26, 1979 you provided the Air Transport Association and its members the report of Polinomics Research Laboratories, Inc. entitled "Alternative Methods of Allocating Airport Slots: Performance and Evaluation" dated August 1979. You requested comments no later than December 14, 1979 but later extended this date to January 15, 1980 in response to our request for additional time.

Your transmittal letter accompanying the report reads as follows:

"It is our intent that this report focus public debate on the important airport access questions facing the national air transportation system including both slots and noise at noise capped airports. The CAB and the FAA are committed only to finding a solution to these problems; we are fully open to any and all meaningful proposals and it should be understood that the Polinomics Study does not represent views of either Agency."

We welcome this constructive approach and assure you that it is shared by our members. We hope that you and we may continue this objective search for answers to the entire range of airport access questions.

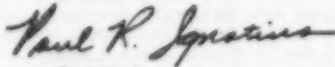
There are clearly very complex issues involved with no perfect solution in sight. I urge that we work together in a constructive effort to resolve the outstanding issues as best we can.

Our reply on behalf of Air California, Air Florida, Air New England, Alaska Airlines, Aloha Airlines, American Airlines, Braniff International, Capitol International Airways, Continental Airlines, Delta Air Lines, Eastern Air Lines, Evergreen International Airlines, The Flying Tiger Line, Hawaiian Airlines, Hughes Airwest, Northwest Airlines, Pan American World Airways, Piedmont Airlines, PSA-Pacific Southwest Airlines, Republic Airlines, Trans World Airlines, United Airlines, USAir, Western Airlines and Wien Air Alaska is enclosed. It contains a summary together with a more detailed analysis.

Mr. Clark H. Onstad and Ms. Barbara Clark
Page 2
January 15, 1980

We will be pleased to meet with you to resolve any questions you may have with regard to our comments.

Sincerely,



Paul R. Ignatius
President and Chief Executive Officer

Enclosure

CC: Honorable Neil Goldschmidt
The Secretary of Transportation

Honorable Marvin S. Cohen
Chairman
Civil Aeronautics Board

Honorable Langhorne M. Bond
Administrator
Federal Aviation Administration

COMMENTS AND RECOMMENDATIONS OF THE AIR TRANSPORT
ASSOCIATION ON AIRPORT ACCESS INCLUDING THE REPORT OF
POLINOMICS RESEARCH LABORATORIES, INC. DATED AUGUST, 1979:
"Alternative Methods of Allocating Airport Slots: Performance and Evaluation"

Eleven years ago in our comments and testimony on the proposed High Density Traffic Airport Rule we deplored the antigrowth philosophy underlying FAA's approach to the congestion problems experienced in 1968. We believed then, and we believe now, that increased capacity, not regressive, artificial restrictions on service, is the right way to deal with congestion. In our response to the proposed 1968 rule we stressed that our support was based "upon the clear understanding that the rule be temporary and that it be accompanied by a carefully conceived, time-phased program to procure the airway and airport capacity which a healthy aviation industry demands."

It is the position of our members that the goals of our national transportation policy should be to provide the capacity needed: (1) to respond to valid public demand for service in a free competitive market, and (2) to permit scheduling flexibility uninhibited by constraints. This is the case at the majority of U. S. airports today. It should be the goal for all major airports serving the public.

RECOMMENDATIONS

We recommend the following steps to the Secretary of Transportation and the Chairman, Civil Aeronautics Board:

1. Enunciate a clear national policy of enhancing airport/airway capacity so that commercial air carriers can meet public demand through flexible scheduling, uninhibited by constraints. Give immediate consideration to a program of greatly increased attention to airport/airway capacity including appropriate accommodation of general aviation at less busy airports.
2. Reexamine the justification for the slot allocations established eleven years ago at John F. Kennedy, LaGuardia, O'Hare and Washington National Airports in the light of today's level of air carrier operations, air traffic control improvements and construction projects completed over the past decade. Slot allocations should be eliminated altogether, or increased as necessary.

January 15, 1980

3. Coordinate the several ongoing studies, including studies by the FAA, ATA and the General Accounting Office, and develop timely action plans based upon them. For this purpose, the Secretary of Transportation may wish to establish a "Discussion Group" of principals from Government and industry to provide a forum for continuing joint review and consideration.
4. Take no further action to impose quotas or other allocation techniques except after full analysis of the characteristics of each individual airport and its traffic patterns and consideration by the "Discussion Group" proposed above. In every case give first preference to solving airport problems, including problems at the airports covered by the High Density Traffic Airport Rule, by overcoming capacity constraints as fully as possible and by allowing the free competitive market to solve the problem by adjusting to cost and delay factors.
5. Continue use of the Airline Scheduling Committees for the present, recognizing their strengths and weaknesses, while the search for other workable methods continues. We do not see an economically or operationally sound alternative to the Committees in the near term, if the quotas are retained.
6. Reject the Polinomics Report because it is not operationally sound. The airlines are, however, prepared to cooperate with the Government and others in an overall examination of near and long term solutions to the problems of airport capacity and utilization.

Fundamental public policy questions relating to airport access are raised by the Polinomics Report. Their resolution will significantly affect the continued availability and growth of efficient, economic and convenient public air transportation. Finding the right answers demands the closest possible communication and coordination between the Government and the airline industry.

Prior to providing specific comments on the Polinomics Report, we believe it essential to focus sharply on the larger problems which should be addressed in the context of access to the nation's airports. The consultant was commissioned to undertake a narrow analysis of the present scheduling committee system and to explore alternatives involving pricing techniques. Although important, such an inquiry fails to address the basic problem.

BACKGROUND

The airlines have become an indispensable component of our national life. In 1979, over 300 million passengers travelled on the 34 U. S. scheduled certificated carrier members of the Air Transport Association. About 85% of all common carrier inter-city passenger miles is provided by commercial air carriers.

The outlook is for continued growth in demand for both passenger and cargo services. By 1990, FAA's latest forecast predicts over 500 million passenger enplanements -- up 65% over 1979. Cargo is forecasted to double -- from 5.2 million tons in 1979 to 10.4 million tons in 1990.

This vigorous growth curve will impact every facet of the air transportation system. Expansion in aircraft capacity is occurring in many ways. During the next decade, load factors (the percent of seats occupied on the average) probably will be 80 to 85%, ^{1/} compared to 55 to 60% in the late 1970's. The average number of hours each plane operates will likely rise from 8.3 hours per day in 1975 to 9.5 hours per day in 1990. New aircraft have wide-body configurations and are quieter, more fuel efficient and able to carry far more passengers.

Questions about system capacity limitations which may affect air service growth have, however, arisen. Congestion and delays at some of the nation's airports precipitated promulgation of the High Density Traffic Airport Rule by FAA in December 1968 ^{2/} and resulted in the establishment of the Chicago, New York and Washington, D. C., Airline Scheduling Committees as a means of achieving compliance with the quotas assigned to certificated air carriers by that rule.

In 1967 and 1968, important elements of the airport and airways system were unable to accommodate the demands of its users with reasonable efficiency. Public awareness of this situation was heightened by widely covered reports of extensive air and ground delays suffered by air carriers and other users. Concerned citizens -- including air carrier management -- pressed the FAA for a quick solution.

Declaring that other, longer range solutions would be developed in time, ("Long-run solutions are dependent upon the modernization and expansion of the airways system and airport development" ^{3/}) the FAA's immediate solution was

^{1/} Based on a consensus of financial analysts.

^{2/} FAR Part 93, Subpart K.

^{3/} Amendment 93.13, 33 FR 17896, December 3, 1968.

a mandated reduction in demand on significant parts of the system. This was accomplished by imposing quotas ^{4/} on the activity of various classes of users at five airports.

Eleven years ago in our comments and testimony on the proposed High Density Traffic Airport Rule we deplored the antigrowth philosophy underlying FAA's approach to the congestion problems experienced in 1968. We believed then, and we believe now, that increased capacity, and not regressive, artificial restrictions on service was the right way to deal with congestion. In our response to the proposed rule we stressed that our support was based "upon the clear understanding that the rule be temporary and that it be accompanied by a carefully conceived, time-phased program to procure the airway and airport capacity which a healthy aviation industry demands".^{5/}

1. THE PRIORITY NEED

Freedom of access to the airport system has become an even more important public issue as a result of deregulation of the airlines -- first in 1977 by a more liberal entry policy on the part of the CAB and, since 1978, as a result of enactment of the Airline Deregulation Act. Both the present Chairman of the CAB and his predecessor have expressed concern that the free market entry goals of the Act might be frustrated by airport capacity limits.

We share the concerns about these constraints and believe that the goals of our national transportation policy should be to provide the capacity needed: (1) to respond to valid public demand for service in a free competitive market; and (2) to permit scheduling flexibility uninhibited by undue congestion, delay, or other operating impediments. This is the situation today at the majority of U. S. airports. We strongly urge this goal for all major airports serving the public.

Attainment of this goal means there must be constant priority attention by the industry, by airport operators, and by Federal and local authorities to developing programs to enhance capacity where operational or environmental constraints exist or are anticipated. There are many tools now in being to accomplish this, but a more comprehensive and better coordinated effort is essential.

^{4/} Originally the FAA rule expired at the end of a year. It was renewed on an annual basis and made permanent in 1973.

^{5/} Comments of the Air Transport Association on Notice No. 68-20, Docket No. 9113, page 1.

Planning for airport improvements by local authorities, the airlines, and by FAA in the Airport Development Aid Program (ADAP), has been generally well performed. The air carriers also assist by preparing the Annual Survey of Airports which ATA provides to the FAA and airport operators. These surveys identify airport improvements deemed necessary by the airlines in order to assist the FAA and airport operators in establishing priorities. Recently, ATA members have launched a renewed comprehensive attack on a broad range of issues bearing on delay/capacity/needs -- including both airside and landside improvements and future technology. We will share the results of this effort with the FAA to supplement its own extensive studies, including:

- "The New Engineering and Development Initiatives: Policy and Technology Choices", dated March 1, 1978,
- "Potential of Noncapital Methods and Their Implementation to Reduce Congestion and Save Energy at Major U. S. Airports", dated May 1978,

All of these efforts, and their implementation should be placed in a coordinated Government-industry setting, to assure a totally balanced approach to the acquisition of new knowledge and its practical application. It is our view that neither Government nor the industry acting alone will be able to produce the best total plans of action.

The Polinomics study was commissioned by the Government to analyze the Airline Scheduling Committee system and to explore alternative methods of allocating airport slots. Although it was a narrow study of one small part of a much larger problem, the Polinomics Report reaches the inescapable conclusion that no method of allocating slots is satisfactory.

In this period of continued growth in public demand, the increasing public dependence on airline service for essential inter-city transportation, and a more competitive airline environment, the underlying need demanding priority attention is:

- Airport and airway capacity adequate to serve the demands of the travelling and shipping public.

The overall objective must be a clear national policy to enhance airport/airway capacity so that commercial air carriers can meet public demand uninhibited by operating constraints.

2. REEXAMINATION OF SLOT ALLOCATIONS

In 1968, airport and airway congestion became so acute in Washington, D. C., New York and Chicago--for example four hour flights between New York and Washington--that bold new actions were required to ameliorate it. The airlines, large and small, foreign and domestic, met under discussion authority granted by the CAB to find ways to relieve this paralyzing condition.

While these meetings were in progress, the FAA adopted its High Density Traffic Airport Rule which established hourly limitations on the number of operations at the five most congested airports, John F. Kennedy, LaGuardia, Newark, O'Hare and Washington National. The rule assigned quotas to three types of users: certificated carriers, scheduled air taxis, and others (general aviation, non-scheduled air taxis, and government, including military).

The hourly limitation and quotas on operations as they exist today are as follows:

<u>Airport</u>	<u>Hourly Limitations (Slots) ^{6/}</u>				<u>Hours During Which Applicable</u>
	<u>Air Carriers</u>	<u>Air Taxis</u>	<u>Other</u>	<u>Total</u>	
John F. Kennedy	70	5	5	80	3PM to 4:50PM
	80	5	5	90	5PM to 7:50PM
LaGuardia	48	6	6	60	6AM to 11:59PM
O'Hare	115	10	10	135	3PM to 7:59PM
Washington National	40	8	12	60	6AM to 11:59PM

Originally Newark Airport was included. It was deleted in October 1970, when some easing of demand and airport improvements obviated the need for such control.

The quotas in effect at the four currently controlled airports have not been changed since their inception. It is well to recall that the High Density Traffic Airport Rule was promulgated as a "temporary" measure pending enhanced airport/airway capacity.

^{6/} The number of slots has not changed since the rule became effective in 1969.

a. Safety is not an Issue

Limitations on scheduled operations have never been and are not now required for safety reasons, as the original Notice of Proposed Rulemaking 68-20 clearly stated. The FAA procedures are devised to assure safe operations at all airports and there is no difference between the safety levels maintained at the large hub airports which do not have limits on scheduled operations and those that do have limitations.

b. Improvements to the Air Traffic Control System

The excessive delays in 1967-1968, which produced the High Density Traffic Airport Rule, were caused primarily by ground congestion resulting from inadequate procedures and hardware for controlling traffic. Since 1968, airport capacities have been increased by airfield construction, including new and/or extended runways, improved taxiways, expanded ramps and a myriad of additional sophisticated landing aids. During the same period, the FAA has substantially improved and expanded its traffic control systems and procedures among which are:

- Terminal Control Areas
- Terminal Radar Service Areas
- Updated Terminal Radars
- ARTS III
- Central Flow Control
- Severe Weather Avoidance Program

These developments in technology have resulted in a vastly improved system over that existing in 1968 when the quotas were established. The airport/airway facilities available in 1968, the inadequacy of which resulted in the High Density Traffic Airport Rule as an expedient, have been improved substantially.

In need of immediate action is revision of FAA's policy of allowing the general aviation fleet to have virtually unrestricted access to the same airport facilities that are essential to air carriers serving the public. Today, general aviation aircraft are utilizing a significant portion of the operating facilities at some airports. For example, 27% of all operations at Washington National Airport were by general aviation aircraft in 1978. FAA estimates that the general aviation fleet, which now numbers 193,000 aircraft, will grow to 297,000 by 1990--up 54%. Federal transportation policy officials should address the questions of whether some of these aircraft should be accommodated at other airports, and whether more reliever airports should be built or improved and appropriately equipped to accommodate them. In the next decade an adequate reliever airport system promises to be one of the most significant improvements to enhance capacity at major airports.

c. The Validity of Quotas

The quotas established in 1968 are not a reflection of the true airport capacity which is demonstrated by the number of daily operations actually handled. Significant technological progress has been made and total air carrier operations have not grown as rapidly as predicted in 1968. The Air Traffic Control System handles more traffic than the quotas permit. In reality, the quotas limit schedules and not operations.

Hence, with less air carrier activity at the controlled airports, and with some improvements in capacity, it appears illogical to continue, unchanged, limitations that were deemed necessary under markedly different conditions eleven years ago. To do so simply provides a disincentive to further enhancing capacity and improving service to the public.

Thus, we urge FAA to reexamine, at each of the four controlled airports, today's limitations with a view to eliminating the quotas altogether, or at least increasing them, where feasible.

We would like to assist in this reexamination, and to encourage such action we plan to file a petition for rule-making with the FAA in the near future.

3. GOVERNMENT-INDUSTRY COOPERATION

In addition to the FAA reports of March and May, 1978, and the Polinomics Report, the FAA has several other studies and tests underway to develop computerized techniques for allocating airport slots. Some are due to be tested this month with airline participation.

In addition, the General Accounting Office issued a report entitled, "Aircraft Delays at Major U. S. Airports Can Be Reduced," on September 4, 1979. This report proposed the use of peak hour pricing and/or quotas to reduce delay at high density airports and emphasized the need for properly equipped reliever airports.

A model outline for future evaluation of this and other related studies is contained in the November 16, 1978 letter from the Office of the Secretary of Transportation to the Director OMB and the Congress in response to the GAO Report. The DOT letter states:

"...However, prior to imposing strict quotas and/or peak hour pricing, we believe that an in-depth study should be made of all factors affecting high density airports. This study should include (1) system impact

on air carrier scheduling, (2) a review of the effectiveness of the present quota system in meeting the demands of all users, (3) operational/legal problem that would be encountered in assessing and collecting peak hour surcharges from users, (4) alternatives, if any, to quotas and peak hour pricing, (5) mechanics for establishing equitable quotas/peak hour prices, and (6) the impact of deregulation through 1985 on airport congestion, particularly with commuters filling the voids left by air carriers."

We applaud this enlightened approach, and we propose that the several ongoing studies dealing with increased airport/airway capacity and the specific problem of airport congestion merit the Secretary of Transportation's consideration of establishing a "Discussion Group" of principals from Government and industry to provide a forum for continuing joint study and consideration of rational solutions to these problems.

4. AVOID FURTHER QUOTAS

We have previously stated our view that the basic problem of enhancing airport/airway capacity must be given priority attention. The possibility of additional airports being placed under quota limitations, and the recent proliferation of proposed allocation techniques to handle the slots at the four presently controlled airports, are matters of grave concern to the airline industry.

Other more effective ways can be found to handle problems of congestion and excessive delay cost. On a day-to-day basis, the air traffic control system can cope with temporary peaks and weather related problems. New Terminal Control Areas can be established to prevent use of congested airspace by inadequately equipped aircraft and minimum general aviation landing fees not based on weight can discourage non-essential use of congested airports.

No further quotas should be imposed, or other allocation techniques considered, except after a full analysis of the characteristics of each individual airport and its traffic patterns by all of the parties of interest. The "Discussion Group" previously recommended would provide an effective forum for such an analysis.

5. THE AIRLINE SCHEDULING COMMITTEES

The airlines, during their 1968 congestion meetings, explored a number of suggestions in search of immediate relief. Among them were:

1. a clearing-house which would determine on a daily basis each carrier's exact expected departure time which could be revised voluntarily to reduce queing.
2. a preplanned delay program combining the "first come, first served" principle with an "authorized priority list".
3. differential pricing to shift operations to off-peak hours.
4. scheduling committees, a concept similar to that which had been used by the international carriers for a number of years, particularly at European airports.

Of these approaches only the scheduling committee concept seemed likely to produce concrete immediate results, if it could be mutually agreed what the hourly limits should be at congested airports.

a. FAA High Density Traffic Airport Rule

Before an agreement could be reached on the proper hourly capacity at any of the affected airports, FAA adopted its High Density Traffic Airport Rule, reciting in the preamble and in other communications that it would look to the carriers to establish a forum (committees or other means) for achieving compliance with the rule.

b. Operation of the Committee System

From the outset, FAA envisioned voluntary action by air carriers and anticipated discussions and agreements as a means of complying with the quotas. In adopting the rule, FAA said:

"As indicated in Notice 60-20, it is anticipated that, subject to approval of the Civil Aeronautics Board, the air carriers can arrive voluntarily at decisions to reduce schedules so as not to exceed the total allocation established by this rule in the interest of efficient airspace utilization. Discussions among the airlines are proceeding pursuant to a CAB Order, and the rule as presently drawn contemplates that an agreement will be in force on the effective date of the rule, April 27, 1969."^{7/}

^{7/} Amendment 93.13, 33 FR 17896, December 3, 1968.

For ten years, the airline participants in the Airline Scheduling Committees have successfully adjusted their schedules to meet the air carrier quotas. Despite their divergent interests, the carriers have been able to make these adjustments and to certify to the FAA that for every controlled hour of every day for ten years the air carrier quota of FAR 93, Subpart K was not exceeded.

During these ten years, the airlines have accommodated many changes. For example: charter airlines increased activity; new foreign flag carriers began Chicago and New York Service; at least 14 carriers obtained Part 401 certificates to serve one or more of the high density traffic airports; recessions and booms in business occurred; route awards were generous, tight, then generous again; and, finally, greater competition was mandated by Congress in the Airline Deregulation Act of 1978. Through it all, the committees worked. New carriers participated and they obtained slots. No carrier ever challenged the legality of the committees. No carrier or, indeed, no citizen or Government observer, ever challenged the results of a committee working session. The record is clear: ten years of difficult and frustrating negotiations have been conducted without any allegation of impropriety.

In view of this experience, as long as quotas remain in effect and as long as no superior method of slot allocation has been demonstrated, the Airline Scheduling Committees should be permitted to continue.

6. THE POLINOMICS REPORT

From a reading of the CAB contract with Polinomics awarded on July 10, 1979, plus discussions with the authors of the Report, it is our understanding that the consultant's assignment was to analyze the economic efficiency and competitive behavior of mutual agreement committees, and to suggest alternatives based on pricing mechanisms for the allocation of scarce airport slots. They were not required to, and did not, develop a full operating system capable of installation and operation, nor did they address the many questions and operational problems which would face Federal authorities, local authorities, the airlines, or other participants, such as air taxis, in meeting quotas under such pricing mechanisms.

Herein lies the principal defect of the Polinomics proposal. It tends to be so conceptual and so lacking in operational specificity as to defy meaningful assessment. Further, the controlled experiments (using students, cards, and flags)--as well as Treasury bond auctions also cited by Polinomics--are so divorced from the practicalities of airline scheduling that they cannot be translated into practical scheduling terms. The consultant has acknowledged that the tests cannot be replicated based solely on the data in the Report.

Under the Polinomies concept, each slot in each hour at each controlled airport would be auctioned off every six months by means of sealed bids. The high bidders for the available slots would win the awards, paying the price of the lowest winning bidder.

At the conclusion of the auction, any carrier could apply to buy or sell a slot at whatever price the market would bear. This would be done anonymously, using a computer to receive and print the buy and sell offers. This "after market" is the proposed technique for cleaning up the loose ends of schedules remaining after the auction. In addition, there would be special auctions for "essential service to small communities" and for off-peak-hour slots. How these special auctions would work was not treated in the consultant's report. The Polinomies Report indicates that the proceeds of all auctions would be used to finance airport capacity expansion or subsidize off-peak-hour usage. It does not, however, state how or by whom this would be accomplished, nor does it address established airport expansion funding programs.

Much of the Polinomies Report is concerned with criticizing the Airline Scheduling Committee system, with many unsubstantiated assumptions, while it ignores many pertinent operational and legal aspects which do not lend themselves to the suggested auction system. For example:

1. The Polinomies Report states that the scheduling committee process does not permit correlation of multi-airport operations (city pairs). While such discussions are forbidden by the CAB, the results are not as adverse as the report suggests. This is because each airline participant is a scheduling expert who is fully knowledgeable of the meaning of each slot requested in terms of that airline's system schedule. For example, one current airline schedule requires that an arrival slot at LaGuardia must link up with a departure slot at that airport. It must also link with successive arrival and departure times at seven other airports, and provide connecting service to or from 13 other flights--along with related scheduling of flight crews, flight services, cargo, ramp services, periodic maintenance, etc. This knowledge of each committee participant is crucial to achieving meaningful results, and it simply cannot be duplicated in a controlled experiment of the kind undertaken by Polinomies.
2. The Polinomies Report condemns the committee system because it does not generate funds for capacity expansion. This is patently irrelevant. There was never any intent that this objective be reached by

scheduling committees, nor has there been any constraint on capacity enhancement at the four controlled airports due to the unavailability of funds for expansion. Moreover, airport expansion funding is a product of airline commitments and payments, together with the Federal ADAP program which is financed principally by taxes on airline users.

3. An auction system in most cases will favor the inherently more lucrative long-haul flights over the short-hauls, which are essential to a full range of public air services. The attached Exhibit I clearly illustrates the relationship of mileage and revenue.

Moreover, it ignores the importance of airline connecting service. In 1978, interline connecting passengers, who comprise a very significant percentage of the short-haul passenger load, numbered one of every three of the total passengers carried by the certificated carriers.

In the development of orderly service patterns, the airlines, through their scheduling techniques, have sought to accommodate the short-haul, connecting passenger. As a result, a large percentage of this class of travelers is handled at peak periods when auctioned slots would presumably be most valuable. Reference to Exhibit I dramatizes the auctioning disadvantage facing airlines which provide the basic short-haul, connecting service.

4. Closely related to unanswered questions about short-haul connecting service is the problem of preserving a level of service to small communities. For example, the Polinomics Report states that special small community auctions would be held--but it is not clear how these would be planned, what origins and destinations would be auctioned, who would be eligible to bid, whether subsidies would be paid, how slots for this purpose would be determined, or why they are needed. In fact, it is not clear why the auction concept becomes involved since under the Deregulation Act the CAB must determine what level of service is essential and arrange for such service.

5. The Polinomics Report takes no account of the special characteristics of international air services. It ignores completely U. S. commitments under international air transport agreements providing for foreign airline access to U. S. airports.

The "United States Policy for the Conduct of International Air Transportation Negotiations", dated August 31, 1978, states, with regard to U. S. airline operations abroad:

"Charges for providing airway and airport properties and facilities should be related to the costs of airline operations and should not discriminate against U. S. airlines."

It would be exceedingly awkward for the U. S. Government to espouse value-based charges at its international airports, such as charges contemplated in the Polinomics auction proposal, when its stated international policy strongly opposes such practices abroad.

6. Commuter airline service and general aviation were not specifically treated in the Polinomics Report. These rapidly growing elements of aviation have a significant impact at many of the nation's busiest airports. The very important questions as to whether or not they would participate in slot auctions in their quota category and, if so, at what price, have been ignored.
7. The Polinomics Report recognizes that an auction system must have adequate safeguards to prevent anticompetitive practices. The extent of safeguards and close surveillance that will be required to assure against frivolous bids to buy out slots at choice hours for resale or, bidding up the price to absurd levels, will entail a massive degree of direct Government involvement and control.

8/ At a special briefing on December 11, 1979 at CAB headquarters the consultant expressed the view that there would be less Government involvement than today. This assertion is difficult to comprehend since Government participation today is limited to a Rule adopted by FAA and review and approval of carrier agreements by CAB.

8. The Polinomics Report makes no reference to the role that Federal and local agencies would play in developing ground rules for holding auctions, awarding slots, collecting funds, expanding funds, determining essential services, and policing the system.

Unless the recommendations of Polinomics are included in a specific rule-making proposal, it is not possible to deal precisely with the legal issues that will be presented. It is, however, obvious that any proposal contemplating the sale of a right to use the airways or an airport and to spend the proceeds for any specified purpose raises a number of jurisdictional, constitutional and contractual questions which have not yet been addressed.

9. The Polinomics Report suggests that the cost of an auctioned slot on a per passenger basis might range from \$5.00 to \$10.50. Using a rough average of \$7.00 per passenger and the 1978 passenger volume at the four controlled airports during slot controlled hours, the amounts of money potentially involved would run into several hundred million dollars annually. At the four airports, this cost would approach the total landing fees paid by all airlines at all airports in the United States and, it would far exceed the Federal outlays for these airports today.

The Polinomics Report states that the proposed auction system would provide greater economic efficiency and thus lower prices to the travelling and shipping public. However, these new auction costs would have to be passed on to consumers, i.e., passengers and shippers. The price for air transportation would be increased significantly. For example, the current round trip fare from Washington to LaGuardia on the shuttle is \$102. Applying the \$7.00 average of the Polinomics' range of cost per passenger, per slot, the fare would climb to \$139. This is based on the \$7.00 charge on departure from National and the \$7.00 charge for the arrival slot at LaGuardia. The same fees would apply in the same fashion for the return trip. It is difficult to see how an auction system, which will substantially increase airline operating costs, can be expected to lower airline prices.

CONCLUSION

In light of the above comments, we can see no merit in proceeding with serious consideration of the Polinomics auction proposal. Nor do we see how Polinomics' second choice, a lottery concept, can be viewed as a viable alternative. With some 900,000 slots to be allocated annually at the four controlled airports, the sheer complexity of random allocation among carriers--hoping to bring order through a computerized after market--produces visions of a new bureaucracy imposed on the industry with even more Government involvement.

Fundamental public policy questions relating to airport access are raised by the Polinomics Report. Their resolution will significantly affect the continued availability and growth of efficient, economic and convenient public air transportation. Finding the right answers demands the closest possible communication and coordination between the Government and the airline industry.

Urgent action is required to improve airport capacity. It must receive priority attention. We stand ready and willing to work with others in this endeavor, and are prepared to cooperate with the Government in an overall examination of near and long term solutions to the problems of airport capacity and utilization.

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PASSENGER REVENUE VALUE
100 SEAT AIRCRAFT - ALL SEATS SOLD

<u>MILEAGE</u>	<u>TOTAL REVENUE</u>	<u>MILEAGE</u>	<u>TOTAL REVENUE</u>
100	\$ 3,487	1400	\$16,879
200	4,720	1500	17,819
300	5,953	1600	18,723
400	7,186	1700	19,627
500	8,419	1800	20,531
600	9,359	1900	21,435
700	10,299	2000	22,339
800	11,239	2100	23,243
900	12,179	2200	24,147
1000	13,119	2300	25,051
1100	14,059	2400	25,955
1200	14,999	2500	26,859
1300	15,939		

BASED UPON CURRENT STANDARD INDUSTRY FARE LEVEL
SET BY C.A.B. EFFECTIVE THROUGH DECEMBER 31, 1979

Mr. ANDERSON. Has the ATA reviewed the FAA's environmental impact statement showing the areas which are subject to the NEF-30 and NEF-40, noise levels under current operations and would you agree that persons living within these contours are subject to an acceptable level of noise?

Mr. PHILION. Yes; we have reviewed the FAA contours; and, yes, there are some noise problems. Our proposed modifications, we think, will do better than the FAA's proposals.

The FAA proposal in its standing and rank is based on a worst case basis and it doesn't take into account the reductions we propose to make in the early morning, late nights and weekends, and those are the periods which noise is more noticeable.

We think it will be of great benefit to local residents.

Mr. ANDERSON. When you computed the NEF 30 and 40 contours for your proposal—

Mr. PHILION. We can't do it exactly the way they have.

Mr. ANDERSON. Why can't you? Is it because of the assumptions they use?

Mr. PHILION. You can't make those kinds of variables. The greatest penalty is the later hour in the evening, and you can compensate for that in some fashion when you are measuring but our best estimate is it is nearly equal to FAA's best proposal.

Mr. ANDERSON. There is a great deal of difference here on what the FAA shows on the NEF-30 and 40 compared to what we hope we can get to down the road. The difference between the red and blue lines, I assume you have seen this?

Mr. PHILION. They have not measured our proposal, Mr. Chairman.

Mr. FARY. Mr. Mineta?

Mr. MINETA. Thank you.

I am just wondering, Captain Horton, on the issue of this vortex, what will be, in order to get this dispersal effect of the vortex, what would be the required separation on the aircraft with wide bodies?

Captain HORTON. Well, as I stated, the present separation criteria is 5 miles. That is the one used throughout the country on air carrier aircraft for commercial airlines.

Mr. MINETA. Regardless of whether it is a heavy?

Captain HORTON. No; there are some variables, light following a heavy, and a large following a heavy, but for an aircraft of the size of a 727 or a DC-9 and a Lear Jet, it would be 5 miles.

We believe there is good cause to increase the standard to 10 miles because of the confined departure corridors peculiar to Washington National Airport.

Mr. MINETA. And if you increase it to 10 miles, what is the impact on the present 60, when it goes to 36 carrier operations, as I recall, right? It goes from 40 to 36 on carrier, 36 per hour without even including the extra sections, what would then be the impact?

Would it take it way below on the tail end of 30 or what would it take it to?

Captain HORTON. I don't have the figures available to me, but I would suggest it would be significant.

Mr. MINETA. Is there a way of correlating that, the 10 miles to working it back? The separation is going to be 10 miles. What would it work out to in terms of the number of flights per hour?

Captain HORTON. You would have to make the assumption every other aircraft departing or arriving at Washington National would be a wide-body jet. That would not be so. Realistically, I really don't know what the proposals might be of the airlines. So I am not prepared to assess the impact today, only to indicate to you that there is significant concern for the necessary separation or what we see is the necessary separation between large and wide-body aircraft.

Mr. MINETA. What about the relationship between the 36 air carrier operations and the 24, well, 12 commuter, 12 general aviation? Have you taken a position relative to the mix of the general aviation and the air carrier?

Captain RUDDY. No; we have not. Our efforts have been directed primarily at what we feel would be safety-related issues, and what we recognize is a proper vested interest of the local community, as well as to environmental disturbances and noise.

The economic impact, the impact on traffic, has not been an area that we felt was really apropos for us to address.

Mr. MINETA. Has much of your comments about the mix of carrier and general aviation been predicated on safety?

Captain RUDDY. Our comments have been predicated on safety, sir.

Mr. MINETA. Based on that assumption, how does ALPA feel about the 35 aircraft operations with the 12 general aviation and 12 commuter operations per hour?

Captain RUDDY. I don't mean to be evasive, sir, but I can't answer that question other than to say our concerns have been relative to the safety of the operating flights. If it cuts the overall airport capacity by a substantial amount, that is obviously unfortunate, but we did not feel it was proper to get into that area.

Mr. MINETA. What about reliever airports, Mr. Kayne? Would that be something that ought to be emphasized as part of this program?

Mr. KAYNE. Definitely, Mr. Mineta.

I would like to come back to that for a comment, because I wanted to get your attention on the question you were asking the ALPA about the following aircraft.

As you are probably aware, someone very nicely put a drawing of Washington National Airport against the wall, and having been both a controller at Washington back in its early days and having flown in and out of there many times both in general aviation aircraft and on airlines, you are probably aware, general aviation aircraft and to a large extent most of the commuters, operate on runways 3, 21, 15, and 33, so that if you space your takeoff or your landing properly, you can avoid any trailing vortices of larger aircraft that are on runways 18 and 36, and there are some airplanes that are using the airport now, particularly the Boeing 747, that is notorious for its wing-tip vortices.

I might add one thing that was found out early in the game on wing-tip vortices. This is not confined, the effect is not confined to

light airplanes. There was an accident, a DC-9 and a DC-10 where in the 9 went over on its back.

Mr. MINETA. Was that the one in Texas? Wasn't that one involving a C-5? Was it a DC-10?

Mr. KAYNE. Yes, sir, the DC-9 is not immune to this, also.

To go back to the reliever airport question, we are firmly committed and we have been pressing the FAA and the Congress for some time for a good program for reliever airports, I mean reliever airports for general aviation that are adequately equipped with instrument landing systems, servicing facilities, and so on.

We think this is one way to drain off some of the traffic from the major airports used by the air carriers.

However, it will not drain off all of the traffic, and we have to recognize that, because there are many general aviation aircraft, particularly those operated for business purposes, that have particular reasons for coming into the major airports.

They have to do business there, and they connect with the airlines and pick up or deposit passengers for the airlines, or they have business in that area and in some cases the major airport, Washington National, for example, is the only one aside from Dulles or BWI that has radar service and other things that may be required for certain weather conditions.

So we would like to see the reliever airport program enhanced to draw off as much traffic as possible from the major airports used by the carriers and, at the same time, the facilities at the major airports also be appropriate for general aviation traffic.

We have for years recommended that where space or terrain permits on a major airport, lay in a short parallel runway that could be used by not only the commuter traffic but by most general aviation airplanes, and thereby avoid using the major runway that is used by heavy jets to avoid the wing vortices and come in on nonconflicting traffic patterns.

It eliminates any question quota, as Mr. Henson already pointed out, so there are a number of steps that can be taken, but the relievers definitely are one program that should be followed.

Mr. MINETA. Any suggestions as to where that might be here in the metropolitan Washington airport area?

Mr. KAYNE. There are a number of suggestions along that line, Mr. Mineta.

We have, and have pushed for some time, for use of the surplus airport that is at Beltsville. That has been sitting there for many years now, and has no particular aviation use. Prince Georges County, I think, at one time was willing to operate it, but we have not been able to break it out of the surplus category.

We have suggested at other times joint use of Andrews Field which has tremendous capacity, but greatly underused. That could be used either as a reliever or to drain off certain air carrier types of operations.

There is a point, however, as soon as you start splitting your air carrier or even connecting operations, commuter, general aviation between airports, then you have the connecting problem. We have that now to some degree with Dulles, Washington National, and so on, and if you have ever flown into Paris, they have it spaced with Charles DeGaulle and Orley Airport.

If you are not careful and go out the other way, you are in bad shape.

Mr. MINETA. What about the problem of the total air space and the ability to handle by having, let's say, a reliever airport in an area, how would this effect the airspace problem? What about the other relative to the radio frequencies that we seem to have that same problem at a given airport depending upon whether you are one landing strip or another?

I am wondering about this, given air space problems, as well as the radio frequency problem.

Mr. KAYNE. I am confident that all of these problems can be worked out, and I say that from a coalition of certain expertise, because this all involves my line of work.

It is possible to use airports that are rather close in proximity, separated traffic patterns, separate frequencies.

New York does it very nicely, not only Kennedy but La Guardia and Newark, as a major airport, plus a number of general aviation airports in the area, and it can be worked out and it has one attraction.

That is that you get the maximum use out of your central facilities.

Mr. MINETA. With the different frequencies, don't we run into a problem as we did with San Diego or the problem we have in San Jose being on different frequencies, one is not aware of the other?

Mr. KAYNE. San Diego, sir, is no different than Washington National in that respect. One of the aircraft was talking to approach control and one of the towers by direction of the controllers; they were in the same control area, you might say.

They were both well equipped, both flown by professionals, and that situation could have been right at Washington National given the same circumstances, which we hope will never happen, but it was not a function really of being on separate frequencies.

We are confident that that does not enter into it. That is not a problem as far as these other airports are concerned.

Mr. MINETA. I would like to ask about this separation and the impact on operations.

Mr. PHILION. I don't think anyone can forecast at this point, at least in the airline industry, how many flights would be conducted with wide bodied aircraft if the FAA proposal is adopted.

It is just impossible to forecast. Under the FAA's proposal we would be permitted to operate 522 flights a day at Washington National, and it is hard to imagine that a large proportion of those flights would be with wide bodied aircraft; and until we have a better judgment, I don't know if we can indicate to you what impact the separation problem might be.

Mr. WINANT. Very briefly, NBAA and GAMA both strongly endorse what Mr. Kayne has said about the vitality of a good reliever system, and we would add to the wish list in the Washington area the name of Davison Field, which is an Army installation. The Corps of Engineers operates it and it is conjunctive to Fort Belvoir.

If Beltsville and Davison could be opened for use by civil aircraft and if something could be done at Andrews, I think that what we talked about today in terms of possible congestion down the pike in the 1980's could be greatly relieved.

Mr. MINETA. Well, that is a Pandora's box. I have been involved in that. We have a field very close to San Jose and we have been getting "touches and goes" to get San Jose moved, but unfortunately the Navy has attack bombers and they bomb our field more often than we have the ability to get leverage on them.

Mr. WINANT. It is a very difficult one; but if we keep plugging away at it—

Mr. MINETA. Is there any place where we do have joint military, defense, and civilian operations?

Mr. WINANT. Yes, sir, there are a number of airports. The one that comes first to mind would be Shephard Air Force Base, which is at Wichita Falls, Tex., a very large Air Force installation which is used heavily by air carriers and by commuters and general aviation.

It also is a very large training installation. Eglin Air Force Base, Fla., and there are probably dozens of such fields across the country that are utilized on a share basis, and I guess each of them took a lot of doing to the point that they became a shared facility.

Mr. MINETA. Thank you very much, Mr. Chairman.

Mr. FARY. Gentlemen, we will conclude your testimony.

Thank you very much for your appearance and your demonstration.

The Chair will call a recess now for 15 minutes pending a vote. [A short recess was taken.]

Mr. ANDERSON. The subcommittee will come to order.

I am informed that the panel of citizens and business groups have relinquished their place to the people who were called on earlier, so we will go back and pick up the panel of the Washington area public officials, and I believe the ones who were not here earlier were Elizabeth Scull, chairperson, Metropolitan Washington Council of Governments, and chairperson, County Council, Montgomery County, Md.; Ellen Bozman, member, county board, Arlington County, Va.; Carl Henrickson, chairman, board of supervisors, Loudoun County, Va.

Your prepared statements, were made a matter of the record earlier, and you may proceed.

TESTIMONY OF ELIZABETH SCULL, CARL HENRICKSON, AND ELLEN BOZMAN—Resumed

Ms. SCULL. Thank you, Mr. Chairman. I appreciate the opportunity to read this testimony. I think that I can persuade the spokespersons for the District of Columbia and Montgomery County not to read their statements.

I am Elizabeth L. Scull, chairman of the board of directors of the Metropolitan Washington Council of Governments (COG), and I am here to present the views and position of COG on the proposed Metropolitan Washington airport policy of the Federal Aviation Administration (FAA).

COG is the regional organization of the area's local governments and their governing officials, plus the area members of the Maryland and Virginia legislatures and the U.S. Senate and House of Representatives, 220 members in all.

COG is responsible for areawide comprehensive planning for the Washington metropolitan area, and through its transportation

policy arm, the National Capital Region Transportation Planning Board, is conducting a 5-year continuing air transportation system planning program for the region.

Since 1975, when a plan for "The Future of Washington's Airports" was jointly recommended by the Transportation Planning Board and our Land Use Policy Committee, COG has worked diligently to achieve two major and complementary aviation planning goals for the region. These are: One, to accelerate and insure the continued reduction of aircraft noise impacts on our local communities, and two to achieve a more rational utilization of the three air carrier airports serving the Washington metropolitan area.

Over the past few years, we have worked cooperatively with the FAA to study and test alternate flight patterns at Washington National Airport in an attempt to alleviate severe aircraft noise impacts on communities under the current flight paths.

To date, a flight path extension along the Potomac River has been tested, and we are considering the feasibility of a "scatter pattern" flight plan. During our studies and public hearings on aircraft noise, it has become clear that the frequency of noise episodes has the most devastating impact on communities and individuals, that the communities along the Potomac River are having over 300 jet overflights a day, and the noise burden on those communities has become well nigh intolerable. But it is clear that unless the rapid unrestrained growth of air travel at National Airport is brought under control, the citizens of this region will continue to suffer unduly and unfairly from aircraft noise.

The other related major concern of COG involves the rational utilization of the three major airports serving the area. Currently, approximately 70 percent of all air passenger travel in the region is concentrated at Washington National Airport, with the remaining 30 percent divided approximately equally between Baltimore-Washington International Airport (BWI) and Dulles International Airport (Dulles). And yet both Dulles and BWI have modern, expanded facilities that are greatly underutilized, while National continues to operate in an overcrowded and congested condition. Sound planning and commonsense strongly suggest that it is time to take steps to correct this serious and gross inequity at BWI and Dulles, and at the same time to reduce both congestion and aircraft noise generation at National.

COG's position on the proposed Metropolitan Washington airport policy is directly related to these two major objectives and concerns. More specifically, COG's position can be summarized as follows:

One, COG supports the general concept and thrust of the proposed policy, as revised, and the urgent need for such a policy.

Two, COG urges the FAA to adopt a 14-million passenger limit at National, rather than an 18-million limit, as the most effective means of achieving the region's major goals of accelerating and assuring the continuing reduction of airport noise impacts on our local communities, and a more rational utilization of the three air carrier airports serving the Washington metropolitan area, through an equitable distribution of flights above this limit to BWI and Dulles.

Three, COG supports the phasing in of wide-body aircraft at National, and the adoption of a firm schedule to reduce hourly air carrier operations by 50 percent by 1985.

Four, COG recommends limiting capital investment in improvements to terminal facilities and access roadways at National Airport to those which would improve the airport's operation, but would not sustain a level of activity beyond the limit finally established by FAA.

Five, finally, the FAA is urged to expedite the construction of the Dulles Airport access road connector in order to enable effective management of I-66, and to promote the development of public transportation to other area airports, including rapid transit to Dulles.

Since we are aware of the position of the Air Transport Association of America and its member airlines, and they have testified at today's hearing, I would like to conclude my remarks with several observations and comments on the airlines' role and responsibilities in this critical matter.

First, we believe that the airlines are in the strongest position to effect a more rational utilization of the three major airports by virtue of their ability to schedule service at these airports.

The airlines have taken the position that the marketplace should determine service. Yet they continue to schedule the most attractive service at National, which results in a self-fulfilling prophecy that the greatest demand is at National.

We are convinced that if some of this attractive service was reallocated to BWI and Dulles, the demand would follow. Our monitoring and forecasts of regional land development activity over the past 5 years clearly indicate that the air travel market, and particularly air travelers who go from home to the airport, has shifted significantly towards BWI and Dulles, and that more attractive service at these two airports would increase demand and utilization.

In this connection, we would like to emphasize that for the most part, except for selected short-haul trips, there are no viable alternatives for the air traveler in the Washington metropolitan area. This means that the airlines will not lose air travelers to other competitive modes by reallocating flights, since, by and large, the air traveler must use one of the three available airports.

We are puzzled by the airlines' attitude in support of continued unrestrained growth at National. In other metropolitan areas, as older, close-in airports become congested and environmentally sensitive, the airlines have supported major shifts to larger, more modern facilities in outlying locations. In the Dallas area, the major airline activity and service was shifted from Love Field to the Dallas-Fort Worth International Airport. In the Kansas City area, airline activities and services were shifted from the old Kansas City Airport to the new Mid-Continental Airport. And, in Chicago, of course, the major shift was made from old Midway Airport to O'Hare International Airport. Why cannot the same logic and rationale prevail here, at least to the extent of shifting some of the heavy air traffic from National to BWI and Dulles?

We have noted that the airlines have proposed permitting a greater number of air carrier operations during those hours when

the ambient noise level is high and reducing them when it is low. In examining alternate flight path concepts for National Airport to reduce aircraft noise impacts, we have learned through experience from our studies and public hearings that ambient noise levels vary greatly throughout the area, even between communities that are in close proximity to each other. Sensitivity to these variations in ambient noise levels is essential to achieving meaningful noise relief.

We have also noted that the airlines have proposed a reduction in the number of air carrier slots on Saturdays and Sundays. They propose to reduce the current 640 slots allocated for Saturdays and Sundays to 534 on Saturdays and 584 on Sundays. However, as of January 1979, only 496 slots were actually used on Saturdays, and 555 slots were actually used on Sundays. In other words, the proposal would actually provide for increases, rather than reductions, in current weekend aircraft noise levels.

Mr. Chairman, these comments and observations point to the need for the airlines to recognize the serious impacts of their operations on our local communities and to meet the citizens of the Washington metropolitan area halfway in working to reconcile their economic objectives with our environmental concerns through a more rational and equitable distribution of air carrier activity at the three major airports serving our region.

Thank you.

Mr. ANDERSON. Ms. Bozman.

Ms. BOZMAN. Thank you, Mr. Chairman.

I am a member of the Arlington County Board, Ellen M. Bozman, and I am also chairman of the Human Community Services Committee of the Council of Governments. I have submitted to the committee a brief statement giving you the Arlington County Board position, which is supportive of the proposed policy and very similar to the statement you have had from Mrs. Scull of COG. I do not want to read that. I want to instead make four very brief comments touching lightly on areas that I think are of particular importance.

The first is that I want to speak a little bit more about the complaints I get about the noise from aircraft from National Airport. As a local elected official, I sometimes think if I could just get rid of the complaints I get about noise from National Airport, I would really have the kind of job that an elected official would like to have, that is citizens calling just occasionally with complaints. As it is, I think I get as many or more complaints about the noise than I do any other single subject in local government.

It is really our considered judgment that the region and the people in the region and the travelers who come to the region will be better served by shifting more of the flights from National to Dulles. To expand on that just one moment, even back in 1975, when the Council of Governments did the study on the future of Washington's airport, we found that 14 percent of the passengers at National Airport would have preferred to leave from a different airport, had there been a flight available.

Now I ask you to remember that that was 5 years ago, that that was 14 percent of the then passengers. I am sure the numbers would be higher today. In the intervening 5 years we have had an

increase in not only residences but businesses which have increasingly been using the areas out to and even beyond the beltway as their primary place of abode or employment.

Once again on the noise question, I would like to give you two very short statements from a letter written from EPA to Mr. Wilding on March 14 of this year, 1980. The first sentence from the letter says:

The proposed policy will increase airport-related air pollution concentrations at Washington National Airport, resulting in continued violation of Federal ambient air quality standards.

The second says:

Implementation of the proposed policy will still leave a 13-square-mile area surrounding Washington National Airport within the NEF 30 noise contour. EPA and FAA are both committed to reducing noise levels below the NEF 30 in residential areas.

Now I should go back and also explain that that 15-square-mile area includes some of the Potomac River and places which are not residential areas, but at the same time does include a large number of residential areas in the whole area.

The second point that I would like to make is that the area is united. The whole metropolitan region is united in wanting the shift of a major portion of the flights from Washington National Airport, and I would suggest to you that a position which is a unanimous position for the whole metropolitan area is one which needs to be considered very carefully and very seriously.

My third very brief point is something that I think we always have to keep in mind. I understand that it does not bear on the proposed policy of FAA, but I think we always need to remember that we are giving a tax break to the airlines who use Washington National Airport. Business property which is housed at Washington National is not subject to local taxes as are the same properties that are housed at Dulles or other airports in this country. By the provisions of the Buck Act which established Washington National Airport, localities were not allowed to impose their business personal property tax, and I think that this inequity may have something to do with the reason that people prefer to house their business property where they are not going to be taxed on it.

Congressman Fisher does have a bill in which would allow the same kind of taxing power at National as exists at the other two Washington airports.

In closing, I would like to say that the FAA-proposed policy begins to close the gap which has existed between Federal policies and local environmental needs. National transportation needs and local environmental needs can successfully be satisfied, given a truly cooperative effort, particularly on the part of the more powerful of the two parties, that is the FAA, and therefore I urge the committee to exert all your influence with the FAA to insure a continuing dialog between the FAA in its unique role as an airport operator, and local jurisdictions in the Washington metropolitan area.

Thank you very much.

Mr. ANDERSON. Mr. Henrickson.

Mr. HENRICKSON. Thank you, Mr. Chairman.

You have my comment, which is essentially a resolution from the board of supervisors to the FAA regarding their specific policy. What I wanted to do was to very briefly emphasize a number of points that were made there, and perhaps elaborate a bit on some of the rationale that was behind making that ultimate decision.

First and most importantly, we are concerned about the loss of air service to Dulles, lost primarily to National and to BWI. Dulles Airport is totally underutilized now. We have a situation where the Congress of the United States is spending money on Dulles Airport to improve the capital facilities, and yet we have some degree of declining utilization at Dulles, and we would like to reverse that trend, or see to it that it does not continue.

Hopefully that capital expansion will address one of the major problems with Dulles, and that is Dulles was conceived during an era where we did not have wide-body jets. Therefore, the number of passengers coming in on fewer flights now are having a more difficult time dealing with the passenger-handling services. That is, they cannot get the suitcases and the baggage off the airline and to the passenger in a reasonable fashion, because of the large number of passengers on the wide-body jets, so I am hoping that the capital expansion that is going on now at Dulles Airport will play a role in reversing that trend.

Dulles serves all types of transportation needs and facilities, and the facilities should be improved to fulfill this role. For instance, the Dulles corridor now is a major commuter corridor for Loudoun County residents, particularly those residents who reside in the eastern portion of the county, and in the immediate vicinity of Dulles Airport. We are hoping that through some cooperative venture with FAA that we can create a park-and-ride lot on Dulles Airport property, and buses will begin using the Dulles Access Road for high-density automobile and bus use, once we have ramps built at 28, so again all types of transportation needs are being met by the Dulles facility.

Finally, the service promoted at Dulles and the public transportation improvements that need to be made at the airport are essential to its continued existence and the expanded growth of Dulles Airport. Earlier appearances here have mentioned something about Metro extension out to Dulles Airport. Our staff estimates that it would cost approximately \$1 billion to do that. I do not know who is going to come up with the funds, and I am sure that that question will be asked. Who should raise those funds? I think that there are more reasonable alternatives than the Metro. One of them will be the parallel toll lanes that will improve access to Loudoun County in general and Fairfax County more specifically, which again encourages use of Dulles Airport.

One last point. I think it addresses one of the questions that was asked earlier. Our prime industrial growth is in the immediate vicinity of Dulles Airport. I think 20 years ago Dulles Airport was envisioned by the population in the county as well as the local governing body then to be a major catalyst in encouraging industrial development in the county. Some have questioned why that has not happened to date. I would argue that that sort of effort is a long-term project, and in order to stimulate some industrial development, it is going to take longer than 20 years.

It is also going to take increased utilization of Dulles Airport, which obviously is our concern, but we are beginning to see some changes, some additional growth in that area. For example, our nonresidential construction permits in the immediate vicinity of Dulles Airport the year before last were running in the vicinity of \$5 million. Our nonresidential construction permits last year were in the vicinity of \$30 million, and while those are not large numbers in terms of industrial growth, they are an indication of the trend that we are experiencing, and we hope to capitalize on that positive activity as well as capitalizing on some increased utilization of Dulles, the Dulles commuter corridor as well as the airport.

I stand ready to answer any questions you may have, and I appreciate the opportunity to appear here today.

Mr. ANDERSON. Thank you very much for your presentation, all three of you.

Mr. HENRICKSON, is noise a serious problem with existing operations at Dulles, and would noise be a problem if the operations were expanded substantially over the next 10 years, and has your county restricted land use so that there will be no new residential development in the noise-impacted areas?

Mr. HENRICKSON. That will require three answers.

The first question is—

Mr. ANDERSON. Is noise a serious problem with existing operations at Dulles?

Mr. HENRICKSON. No, sir, absolutely not.

Mr. ANDERSON. And would noise be a problem if the operation were expanded substantially over the next 10 years?

Mr. HENRICKSON. No, sir. The reason for that is that the FAA has made every effort to contain the 30 contour within the physical contours of the property that they own at Dulles Airport. That is item No. 1.

Item No. 2 is that we have zoned the property in the immediate vicinity of the airport for commercial and/or industrial use and nonresidential uses are specifically excluded from that immediate area.

Mr. ANDERSON. You have partly answered my final question, but I will state it again for the record. Has your county restricted land use so that there will be no new residential development in noise impacted areas?

Mr. HENRICKSON. Yes. We do that. Our current comprehensive plan, which is just recently adopted by the board of supervisors, specifically excludes residential growth in the immediate vicinity of the airport.

Mr. ANDERSON. Mrs. Scull, your testimony indicates that COG supports a 14 million annual passenger limit for National. Is there any special basis for selecting this number in preference to FAA's goal of 18 million?

Ms. SCULL. Yes. COG is troubled not only by the numbers of planes coming in and out of the airport, but also the land-based transportation, and the problems caused by that, and it does not want to see the use of wide body planes make possible the increase in the number of people coming and going. Would you like to add to that, Mrs. Bozman?

Mr. ANDERSON. I suppose my question was more why did you pick 14, why not 13 or 15? Was there something magical about that number 14? Have you made some study to determine that this would be a figure that your land transportation would be able—

Ms. SCULL. Mr. Henrickson has the background on the choice of that particular number, Mr. Chairman.

Mr. HENRICKSON. Mr. Chairman, I serve on the Council of Governments board of directors, and as I recall the discussion at the board level some month and a half ago I guess, the figure of 16 million was introduced, and bandied about the room somewhat, and it was pointed out that a previous position taken by FAA and endorsed by COG at some previous position statement had chosen the figure of 14 million, so that is an effort to remain consistent with the previous FAA policy as I understand it as well as the previous COG policy.

Ms. BOZMAN. May I add a very pragmatic note to that. We are dealing here with a moving target. I think the jurisdictions have in a pragmatic sense not wanted to say National Airport, you have got to cut back below the number of people you are presently serving. At the time of 1975-76 when the Council of Governments was doing the first study on the future of Washington Airport I think Washington Airport was serving something like 11 to 12 million passengers, in that neighborhood.

Mr. ANDERSON. It is about 15 million now, is it not?

Ms. BOZMAN. That is right. It is growing so rapidly that if we just keep up with what has already happened we have to keep raising the number. We were at one point willing to raise it to the 14, and now it has leaped past us again, and I think the Council of Governments is saying we have got to hold the line somewhere, and by golly, it is 14 million. As I say, it is a pragmatic approach.

Mr. ANDERSON. Do members of the panel have concern with the division of traffic between the area airports, apart from the noise which results from the extensive operations at National—in other words, how should it be divided between BWI or Dulles?

Ms. BOZMAN. Again, I think the council is saying roughly half and half. This is I think open to negotiation as to how much BWI and Dulles really want of the expansion.

I would say, second, that the Council of Governments has not tried to make the determination which we assume the private carriers will be making as to which of those two locations they need to provide more service from.

Mr. ANDERSON. Do you favor continuation of the FAA management of National and Dulles, or do you favor an alternative form of management? One of you is smiling.

Ms. SCULL. We would prefer local or regional control very definitely, Mr. Chairman. Home rule for National.

Mr. HENRICKSON. If I may, if I can fill you in on a little bit of history at least. During the Nixon administration I believe Dulles and National were put up for sale, and at that time there was a proposal being passed about by all the local governing bodies then for the formation of a northern Virginia regional transportation authority for the specific purpose of buying the two airports and operating them. I favor that concept, which I think directly answers your question.

I am concerned now that there are certain practices, and I wish I could give you a specific, but FAA will impose requirements on all airports except for National and Dulles, and will ignore their own requirements in the operation of their own airport. I think sometimes that this offers some degree of inconsistency, particularly for the other airport operators, and I also feel that from the public's perspective, a little additional local control would be appropriate for both of those airports.

Mr. ANDERSON. If the airlines were willing to reduce service at National over the weekends, would this be of great value to the residents in your jurisdictions, and are there any weekend time periods in which a reduction or elimination of service would be particularly welcome?

Mr. HENRICKSON. Let me speak to Dulles Airport, because I think the answer to all of those questions is that any increase in service or decrease in service at Dulles Airport would have an insignificant impact on the citizens of that county.

Mr. ANDERSON. Are you aware of any problems created by the present policy of allowing general aviation aircraft which are not jets to operate throughout the night at National?

Ms. SCULL. I think our concern is focused on the jet aircraft, Mr. Chairman.

Ms. BOZMAN. I would give you again a very pragmatic response, because I am not aware of what is flying over when I hear it or when a constituent calls me. It is generally not. I do not get the complaints about plane noise after 11 p.m. that I get about planes anytime between 7 a.m. and 10:30-11 p.m., so I would say in looking at the magnitude of the problem, that that must be of a smaller scale than the normal operations at National, commercial operations.

Mr. ANDERSON. I draw from your testimony that you get quite a few telephone calls complaining about noise. Do you also get any telephone calls supporting service at National because it is more convenient?

Ms. BOZMAN. I get none.

Mr. ANDERSON. You get none?

Mr. HENRICKSON. I get all sorts of questions asking why we do not have additional service at Dulles. Many of my constituents, because they are in the immediate vicinity of Dulles Airport, find it far more convenient to travel in and out of Dulles, and if you ever tried to get a flight from Dulles to Pittsburgh or Dulles to Atlanta, it just cannot be done. It is extremely difficult, and it requires a trip downtown to National in order to fly to Pittsburgh or even to Philadelphia, Newark, and even Boston. I believe there is only one flight daily in and out of Dulles Airport to Boston.

Mr. ANDERSON. How would you suggest improving ground access to Dulles and BWI Airports? It seems to me that if you begin shifting traffic to these airports in a wholesale manner it will require development of faster service to the downtown area. In your opinion, what improvements in access are needed, and how should they be paid for?

Mr. HENRICKSON. I do not know that anybody has in their back pocket \$1 billion for a Metrorail line out to Dulles from the Falls

Church West Metro Station. I think that is the optimum. The pragmatic answer to it is that it is just an impractical solution.

The alternative then relies on higher-density automobile traffic, limousines, buses, and perhaps some degree of priority in terms of the lanes that they use, once they get onto the highway itself, and into the more congested areas, particularly in the I-66 corridor, once that is completed. I think that I find that transportation alternatives that are provided by Dulles Airport, namely the Greyhound service that was servicing the airport, was a perfectly acceptable alternative to getting in and out of Washington, D.C., and I found that the time involved was not that significant. More often than not I utilized that facility or those transportation facilities to get in and out of Washington to my COG meetings, and found it to be perfectly reasonable. So I think from a pragmatic approach that is the more likely alternative, some degree of increased service to Dulles Airport by bus service, and I might add there is a private concern now that is offering bus service to the communities of Sterling Park, Sugarland Run, which are residential communities in eastern Loudoun County. And its primary access in and out of Washington, D.C. is the Dulles corridor, and it is becoming reasonably successful, that is, they are expanding their service. We hope at the county level to be offering very shortly a commuter line that will bring in other parts of the county to that bus service, so that they can take advantage of the service provided by that private organization, but I think ultimately that is the real answer, is some degree of added bus service in and out of Dulles.

Mr. ANDERSON. Would a shift to Dulles and BWI have a significant impact on automobile fuel usage in the metropolitan Washington area, and how much of a role should this play in the decisions that are to be made?

Ms. BOZMAN. I do not believe it is possible for anyone to give you a factual answer on that. We would have to calculate how many people, the origin as well as the destination of all the passengers using each of the airports. My suspicion is that we would find that it did not increase gasoline consumption for two reasons. One, I think we would find some passengers taking shorter trips to go to Baltimore and Dulles than they now use to go to National, and as Mr. Henrickson has said, I think when we are talking about those two airports, we are talking about mass transit in terms of buses, limousines, instead of single family passenger wife taking husband to drop him at the airport kind of thing.

Mr. ANDERSON. I believe that completes your presentation. Thank you very much, Ms. Bozman, Ms. Scull, and Mr. Henrickson.

[Subsequent to the hearing, the following was received for the record:]



metropolitan washington
COUNCIL OF GOVERNMENTS

1875 Eye Street, N.W., Suite 200, Washington, D.C. 20006 223-6800

June 18, 1980

The Honorable Glenn Anderson
 Chairman, Subcommittee on Aviation
 Committee on Public Works and Transportation
 U.S. House of Representatives
 Room 2251
 Rayburn House Office Building
 Washington, D.C. 20515

Dear Congressman Anderson:

I appreciated the opportunity to testify before the House Public Works Subcommittee on Aviation during the recent hearing on the proposed operating policy for Washington National Airport. During the hearing, the Committee asked members of the Panel of Washington Area Public Officials, a series of questions related to the impact of the Airport on the Metropolitan Washington Area. Since I am extremely concerned about the serious effects of National Airport operations on our local communities, I have prepared more comprehensive answers to each of the questions addressed to our Panel. I would greatly appreciate the incorporation of the enclosed attachment in the official hearing record.

Thank you for your interest in this issue of vital importance to the residents of the Metropolitan Washington Area.

Sincerely,

Elizabeth L. Scull
 Chairman of the Board
 Metropolitan Washington
 Council of Governments

Attachment

District of Columbia • Arlington County • Fairfax County • Loudoun County • Montgomery County • Prince George's County • Prince William County
 Alexandria • Annapolis • College Park • Fairfax City • Falls Church • Gaithersburg • Greenbelt • Rockville • Tysons Park

COMPREHENSIVE RESPONSES

FROM

ELIZABETH L. SCULL

CHAIRMAN OF THE BOARD

TO

QUESTIONS FROM MEMBERS OF THE SUBCOMMITTEE ON AVIATION,
AT ITS PUBLIC HEARING ON WASHINGTON NATIONAL AIRPORT

JUNE 11, 1980

Question 1: Mrs. Scull's testimony indicates that COG supports a 14 million annual passenger limit for National. Is there any special basis for selecting this number in preference to FAA's goal of 18 million?

Answer: The FAA's proposed goal of 18 million allows for nearly 3 million additional passengers. This will result in an absolute growth of 20 percent placing additional pressure on already overburdened ground access and terminal area facilities at National. Since 1975, when a plan for The Future of Washington's Airports was jointly recommended by the National Capital Region Transportation Planning Board and COG's Land Use Policy Committee, COG has supported the introduction of a passenger ceiling at National which would expedite a more rationale distribution of passenger traffic at the area's three major airports. COG's recommendation of a 14 million passenger limit would achieve more balanced use of the area's airports and a much needed reduction in air carrier activity at National.

Over the Past 5 years, COG has watched with dismay the rapid and continuing growth at National while we waited for an FAA policy which would stop the growth. Now in 1980, the proposed policy providing for additional growth is unacceptable to us. COG wants no further growth at National.

Question 2: Do the members of the panel have concerns with the division of traffic between area airports, apart from the noise which results from extensive operations at National?

Answer: Yes, we are also most concerned about the ground congestion and air quality impacts associated with extensive operations at National. In addition, our monitoring and forecasts of regional land development activity over the past five years clearly indicate that the air travel market has shifted significantly towards BWI and Dulles. Therefore, we feel that more service at these airports would attract many airport users in the Metropolitan Washington Area for whom BWI and Dulles are the more convenient airports.

Question 3: Do you favor continuation of FAA management of National and Dulles, or do you favor an alternative form of management?

Answer: As stated by the Congressional panel this morning, I would support the exploration of an alternative form of management. The benefits of local ownership would be welcomed as ownership would provide local control of noise and pollution impacts as well as another revenue source. However, the multijurisdictional nature of the area requires a study to determine the most effective means of control, that is, an airport authority state, commission, etc.

Question 4: Have you received any letters or phone calls supporting service at National because it is more convenient?

Answer: My calls and letters are overwhelmingly in opposition to National due to the severe noise impacts suffered by my constituents in Montgomery County. It is my under-

standing that the staff at the Council of Governments receives an occasional call during which the caller will acknowledge the convenience of National while emphasizing his or her strong support for greater use of Dulles and BWI. Most frequently cited reasons are the callers' concern about the daily impact of noise from National on their quality of life. In the Metropolitan Washington Area, we cannot afford the luxury of the convenience of National because we are acutely aware of the adverse impacts it has on the health, welfare, and quality of life of our residents.

Question 5: If the airlines were willing to reduce service at National over the weekends, would this be of great value to the residents of your jurisdictions? Are there any weekend time periods in which a reduction or elimination of service would be particularly welcome?

Answer: As I indicated in my testimony, COG's studies and public hearings on aircraft noise clearly indicate that the frequency of noise episodes have the most devastating impact on communities. Therefore, reduced activity or elimination of weekend service would be welcomed. However, unless this relief were coupled with sufficient reduction of weekday service and the introduction of the FAA's proposed curfew, our residents would continue to be the victims of an unnecessary and inappropriate noise burden while the area's other two airports designed during the "jet age" remained under-utilized.

Question 6: Are you aware of any problems created by the present policy of allowing general aviation aircraft which are not jets to operate throughout the night at National?

Answer: Yes, the aircraft noise complaints received by elected officials in the Metropolitan Washington Area are not confined to the operational time frame currently associated with air carrier activity.

In the late night and early morning hours, ambient noise levels throughout the area tend to be quite low, thus the general aviation activity during these hours is both intrusive and disruptive to the sleep of many of our residents. Since 1975, COG has continually urged the FAA to implement a mandatory curfew for National Airport and we are in complete support of the FAA's proposed action in this regard.

Question 7: How would you suggest improving ground access to Dulles and BWI Airports? It seems to me that to begin shifting traffic to these airports in a wholesale manner will require development of faster service to the downtown areas. In your opinion, what improvements in access are needed, and how should they be paid for?

Answer: Improved access to Dulles Airport is well underway. The completion of I-66 is scheduled for 1982 and the Dulles Access Road connector will be completed shortly thereafter. With the Access Road and I-66 completed, passengers will be able to make the trip from downtown Washington to Dulles in 30 minutes.

In addition, access will be further improved when the Orange Line of the Metrorail in West Falls Church is completed in mid-1985. The National Capital Region Transportation Planning Board adopted a resolution endorsing a shuttle bus service operating between the West Falls Church station and Dulles Airport using the Dulles Access Road. Similar services exist in other airports such as O'Hare in Chicago and JFK in New York, and work quite well. Thus, we expect this service to provide substantially improved access to Dulles.

With respect to BWI, recent improvements in their limousine service have improved access to the airport and made it convenient for more suburban passengers to use the service. Another improvement, which is about to be initiated, is the opening of an Amtrak station at the airport which will provide convenient access from downtown Washington.

Question 8: Would a shift to Dulles and BWI have a significant impact on automobile fuel usage in the metropolitan Washington area? How much of a role should this play in the decisions that are made?

Answer: Transferring of airline flights to Dulles and BWI will have some effects on energy consumption.

While it is true that some passengers will have longer trips to Dulles or BWI than to National, others will have substantially shorter trips, offsetting the longer ones.

Two key points are worth noting: First, although the number of airline trips originating in Washington has increased, Washington's share of all trips has declined. Demographic data indicates a significant shift in population away from the city to the suburbs, making Dulles and BWI more convenient for a greater number of people. Second, in terms of air quality, the present congestion at National results in substantial hydrocarbon emissions from long traffic queues which could be diminished by transferring some airline activity.

Question 9: What is being done in zoning and land use policy to insure that Dulles does not develop noise problems? We have heard that residential development demands are being made on the area around Dulles. How will we handle these demands?

Answer: The FAA benefited from the experience at National Airport and conceived and designed Dulles with a buffer zone to minimize noise impacts on area residents. Our local governments in both Fairfax and Loudoun Counties have used their zoning and land use powers to create additional buffer zones through compatible land use planning designating land immediately adjacent to the FAA's buffer area for industrial and commercial usage. These innovative and aggressive local government actions demonstrate our region's commitment to assisting the FAA and avoiding the creation of "another National Airport" in our region.

The rumors you have heard regarding pressures for residential development around Dulles are not unwarranted; however, we, the local governments, have established the necessary policies to resist these pressures. We will not allow more of our population to be subjected to the deleterious impacts of aircraft noise. We ask only that the FAA implement a policy to reduce the devastation currently caused by National Airport.

Mr. ANDERSON. Our final panel is a panel of citizens and business groups, Eric Bernthal, chairman of the Coalition for Airport Problems; Sherwin Landfield, member of the executive committee, Virginians for Dulles; Carrington Williams, board of directors, Committee for Dulles; H. D. Lewis, president, Committee for National, Arlington Chamber of Commerce. I understand that John Hechinger, former chairman of the City Council of the District of Columbia, and president of Hechinger Co., and Virginia State Senator Clive Duval are not here, though I do have their prepared statements and the prepared statements of the members of the panel. These statements will be made a part of the record at this point.

[Statements referred to follow:]

STATEMENT OF ERIC L. BERNTHAL, PRESIDENT, METROPOLITAN WASHINGTON COALITION ON AIRPORT PROBLEMS ("CAP")

The Metropolitan Washington Coalition on Airport Problems ("CAP") is an umbrella-organization consisting of more than 100 citizens' associations and groups from the Washington metropolitan area. CAP was formed to create, for the first time since jets were brought to National Airport 14 years ago, one unified citizens' voice, combining the experience and common concerns that tens of thousands of Washingtonians share over National Airport. Our members have studied, complained, lobbied, testified, and sued to establish a rational airport policy for this region.

More than anything else, this process has been marked by frustration for the citizens of Washington. As these hearings are held today, I am reminded of the testimony of a Virginia Senator:

"If there is logic in the continued expansion of crowded National Airport—while nearby Dulles operates well below capacity—it escapes me. But the consequences of that development are all too clear—noise, pollution, and safety hazards over the residential areas surrounding National, and growing inconvenience and delays for those who use its facilities."

These sentiments were echoed by most of the other 36 witnesses who testified—at Congressional hearings, on this very same subject, eleven years ago.

Eleven years ago the traffic at National Airport was at such dangerously high levels, the environmental impact of National so severe, that the Senate held hearings to question the future role of National Airport. Thousands of area residents found the simple enjoyment of their homes and yards to be nothing but a memory; the incessant overflights—up to 300 a day, both north and south of the airport—became a constant intrusion into people's lives; and Washingtonian magazine was prompted to describe National Airport as "the great filthy beast of the Potomac."

That was more than a decade ago. Since then, National Airport's passenger volume—already at a record 10,000,000 passengers per year—has increased to 16,000,000; Dulles Airport, built with federal funds in 1962 to be Washington's primary jetport, continues to handle no more than 15 percent of the commercial jet traffic in our region; indeed, Dulles has fewer commercial jet flights today that it did ten years ago.

For its part, F.A.A. will finally be issuing an environmental impact statement on National Airport this fall—but only under threat of a contempt of court citation, and a full seven years after its first draft. All calls for rational policymaking have been ignored: the Environmental Protection Agency has protested again and again that National Airport is grossly overutilized; the Department of the Interior has called for a major reduction in air traffic at National; the National Park Service has warned that our nation's most cherished monuments, the Lincoln and Jefferson memorials, are literally falling apart from the vibration and pollution which is rained down on them hundreds of times each day; the Metropolitan Washington Council of Governments continues to call for a wholesale transfer of flights from National to Dulles and BWI and has lamented the "accident of history" that has made this the only metropolitan area in the United States which does not control its own airports. And the National Capital Planning Commission has called for the closing of National Airport altogether.

We have spent literally hundreds of hours in analyzing the National Airport problem. I am submitting for the record the comments of our organization which we submitted in the F.A.A.'s rulemaking proceeding on Washington airports policy. It

is lengthy, but you will find the entire citizen viewpoint expressed in that document. For today, I would like to stress just two points:

First, there must be a phased-in, 50 percent reduction in commercial jet slots at National. This will compel an orderly transfer of flights from National to Dulles and BWI. The airlines may not like having to give up the captive market they now have which compels virtually all travellers to pass through National. But we have no right to expect responsible policymaking from the airlines, on their own. As former F.A.A. Director Quesada testified eleven years ago, "We just have to find some way of bringing a reasonable and logical restraint on the uninhibited use of National Airport. I assure you that this cannot be accomplished by agreement with the airlines." And I implore this committee not to be fooled by the fears that reduction in National's slots will translate into loss of service to and from your communities: that may happen as a result of deregulation, or rising fuel costs, but the question of whether there is service to Washington is quite separate from the question of where that service lands in Washington.

Second, Dulles and National must be transferred to an autonomous regional authority similar to Port Authority in New York. After all these years, the one thing that is certain is that the federal government should get out of the airport business. Indeed, in the past three months we have had lengthy meetings with the FAA Administrator, Mr. Bond, the Secretary of Transportation of the United States, a high-ranking member of the White House staff, and we now testify before this Congressional committee. It is sad and absurd that the highest levels of the federal government must turn their attention from more important tasks to formulate operational policies for Washington's airports.

We have heard every imaginable justification for the present overuse of National Airport—"National is so convenient"; "National is a 'national' airport"; "National is essential for Washington's business community". We suggest to you that none of these arguments will stand up to fairminded scrutiny or logic. When the residents of Chicago, Kansas City, Dallas and Houston argue to you that they have some inalienable right to fly into National, ask them why we fly to O'Hare, Kansas City International, DFW, or Houston International when we visit their cities; when the airlines tell you that they are only responding to the marketplace and providing service from National because that is what the public wants, ask them how the public can choose when there is only Chicago-bound flight out of 66 a day which uses Dulles, and not a single flight from Dulles to Buffalo, Detroit, Pittsburgh, Cincinnati, Cleveland, Charlotte, Little Rock, Albuquerque, Jackson, Portland, Milwaukee, Omaha, Sacramento, Toronto, Spokane, Shreveport, or Tucson.

There remains only one final argument, and that one requires neither logic nor open-mindedness: "Congress won't have it any other way." Proving that old saw wrong is up to you.

SUMMARY OF STATEMENT SUBMITTED BY COMMITTEE FOR DULLES, BY CARRINGTON WILLIAMS

A summary of the position of the Committee for Dulles is this:

1. The Government's strong bias for National Airport over Dulles is inconsistent with declared government policy of deregulation of the airlines to promote fair competition. National is the fair-haired child, Dulles the step-child.
2. Growth at National Airport is almost reckless (1 million passengers per year) and must be stopped if a sensible overall plan for Washington Metropolitan Airports is to be developed.
3. Dulles has lost 40 scheduled flights and 20 percent of its passengers in the last year under deregulation. National is at 125 percent of capacity.
4. The proposed DOT Policy heads in the right direction but does not go far enough in that:
 - (a) It allows immediate convenience demands to prevail over existing job needs and economic growth in this area, particularly in Fairfax and Montgomery Counties.
 - (b) Over 30 percent of the Northern Virginia population is closer to Dulles than National, yet Dulles has only 18 percent of the total scheduled flights (this does not include the Maryland population which is closer to Dulles).
 - (c) At National Airport there should be:
 - (1) A passenger limit of 13 million per year;
 - (2) A limit on airline operations of 30 per hour;
 - (3) A 9:30 p.m. curfew;
 - (4) Access for wide-body jet aircraft only if two regular jet slots are eliminated for each wide-body admitted;

- (b) Continuation of the 650 mile service radius, plus eliminating the grandfathered cities beyond it.
- (d) Continued ownership and operation by the Federal Government of both airports only if the Government stops favoring National and adopts a rational metropolitan airport policy.

STATEMENT SUBMITTED BY COMMITTEE FOR DULLES

Mr. Chairman, Members of the Subcommittee, the Committee for Dulles is a volunteer group of individuals and businesses interested in promoting the use of Dulles International Airport. We thank you for the chance to express our views, views which have been developed through the recent school of hard knocks in which we have become educated.

The policy of the Congress has been declared to be deregulation of the airlines. With fewer restraints on the air carriers, competition should be promoted and service will be improved. That assumes a relatively free operation of the market place. But there can be no free operation of the market where the government treats with such gross inequality the only two commercial airports which it owns and operates. National is the fair-haired child, Dulles is the step-child. It matters not whether this is by deliberate design, the plain truth is that the government favors National over Dulles. The government has yielded over the years to the expedient demands of various groups which saw more convenience, or better revenues, to be derived by an even greater concentration of airline services at National.

Not so long ago policy statements projected an upper limit of 4 million passengers per year at National to govern its growth for "at least the next decade". Then that was raised to 6 million, then 8, then 10, 12, 14 million passengers etc. The projection now is for 37 million for the region by 1990, or 25.1 million for National, which grows by 1 million passengers per year.

Unless that growth and short-sighted imbalance in service are stopped now, things will get so far out of kilter that there can never be sensible regional airport planning.

In the last year Dulles has lost 40 scheduled carrier flights and its 1980 passenger count is down 20 percent, while National is operating at 125 percent of capacity. It handles 66 percent of the passenger traffic in this area, Dulles and BWI each about 16 percent. At Dulles the United States is wasting probably the finest airport in the world. Instead of maximizing our assets and reducing liabilities, the Government is doing the opposite.

Why? Because the immediate convenience or economics of passengers and carriers, or the demands of distant cities, have taken precedence over development of an airport policy for the Washington area.

We are told that the government cannot "promote" Dulles and National because this would be unfair to other cities, but government policy in fact does promote National and downgrades Dulles. So the Committee for Dulles and others prevailed upon the Virginia General Assembly, in which I served for ten years, to make a small appropriation for Virginia's Department of Aviation to provide an office for promotional services there, beginning July 1, 1980. But that small effort cannot begin to meet the competition from the government through its bias in favor of National.

We applaud the efforts of Marylanders in the Baltimore area to promote BWI. They are showing commendable initiative. But thanks to the U.S. government, we at Dulles feel like the proverbial one-legged man in a kicking contest.

We ask you for no special breaks. We simply request the Congress and the FAA to grant Dulles equal treatment if there is to be a serious, well-planned regional government air transportation policy.

The proposed DOT policy is contrary to regional growth patterns. The origins and destinations of the bulk of the new local origination passengers in the Washington area are outside the Beltway, and thus more conveniently served by Dulles than by National. These new passengers use National, not because it better suits their travel needs, but because it is not possible to get the flights needed from Dulles.

In the period 1975-79, more than 15,000 new jobs were created in Fairfax County alone in areas better served by Dulles than by National. Many of the firms which employ these new people generate hundreds of new incoming and outgoing air passenger trips each year. The development at Tyson's Corner—the most phenomenal in the region—is an example. Literally hundreds of business firms have moved there in the last few years; over 10 million square feet of office space will be located in that area alone by 1983. And during the period 1960-1984, this growth should dramatically accelerate, possibly exceeding 25,000 new jobs in hundreds of new firms in the immediate service area of Dulles rather than National.

Our figures are limited to Fairfax County alone. Montgomery County and contiguous areas of Maryland could furnish perhaps equally dramatic employment figures to justify their more convenient access to Dulles than to National.

The last study by the Committee For Dulles more than two years ago showed that, even then, 36 percent of the population of Northern Virginia was closer to Dulles than to National. In the ensuing two-year period the population percentage has increased substantially over 30 percent, while the scheduled flights at Dulles have decreased to and estimated 18 percent of the total between National and Dulles.

In terms of balanced economic growth and efficient transportation—ground and air—that just does not make sense.

In response to the Notice of this meeting, the position of the Committee for Dulles on the policy proposed by the Department of Transportation for Metropolitan Washington Airports is, in brief, as follows:

1. A limit of 18 million passengers per year at National is far too high. The congestion at National now with an estimated passenger count of 15.2 million per year shows how unrealistic the projected 18 million is. The maximum should be phased back to 13 million.

2. The number of airline operations at National should be reduced from 40 flights per hour to 30, not 36.

3. We support reducing the hours of operation at National. We feel there should be a 9:30 p.m. curfew. Operations should continue to start no sooner than 7:00 a.m. on weekdays, and 8:00 a.m. on weekends.

4. We agree that wide-body jet aircraft should be granted access to National, provided two regular jet slots are eliminated for each wide-body jet admitted.

5. The present 650 mile service radius at National should be maintained, and the cities which are grandfathered beyond that radius should be phased into compliance. If the government want to starve the Dulles step-child some more, increasing the radius to 1,000 miles as the FAA proposes is as good a way as any.

6. Respecting Federal ownership and operation of Dulles and National, our position depends on adopting measures which will put Dulles on an equal, competitive footing with National. That includes financial support for promotional activities of the sort, for example, now undertaken at BWI. If that is not done, then let's put Dulles out for adoption by somebody who won't starve it but will love it and bring it up right.

7. As to noise and air pollution, they also militate strongly in favor of limiting the growth of National.

Mr. Chairman, the Federal government has a unique opportunity to shape air transportation policy in the Washington region. It is not constrained, as with Metro, to being subject to the policies and whims of numerous local governments. The Committee For Dulles asks only that governmental policy look ahead, that it stop the reckless growth at National to correct the present gross imbalance. This we feel is a policy which, as sure as the sun comes up, will prove justified.

Thank you.

STATEMENT OF SHEKWIN LANDFIELD, DONALDSON RUN CIVIC ASSOCIATION

Jet planes ain't allowed o'er the White House.

Nor 'lowed o'er the Capital Dome.

But if you've no pull to protect you,

Oh Lord, is it loud o'er your home!

Both the Capitol and the White House, not to mention a Federal judge, have largely given this problem to the FAA to handle. After their four years of work on an Environmental Statement how can we now characterize their major effort? Are they democratic in approach? For example, did they notify our civic group of this hearing? No! But perhaps they placed a notice in the press. Yes! Buried in the classified ads!

Well then, are they objective in presenting the problem? Their basic noise contour map shows our home outside their critical 30 NEF (noise exposure) line. By their definition we do not hear the roar which is the only real problem our home has. Are they at least scientific? Does their EIS discuss the latest medical or economic research on the effects of noise on our person and our property? No!

Are they responsive to citizen input? I would estimate that 90% of the public comments I heard in the hearings two years ago have still not been dealt with.

Are they economic in their use of our public property? Well they bought 12 times as much land for Dulles as National has. For 12 times the traffic? No. One-fifth. An incredible negative cost-benefit ratio of 60-1. Of course, they really need that extra land for approaches and as an air pollution drop and so they have taken the air

rights . . . de facto . . . to thousands of acres of our finest public and private lands and waters.

So . . . on the currently popular rating scale of "Ten" how would we grade the shape and attractiveness of this portion of the FAA that rates so low in democracy, objectivity, science, economics, and responsiveness? Two? One? Zero?

The FAA really cannot handle this problem because they have become a large part of the problem and they have lost the public's confidence. Divestiture of these functions is urgent before the FAA as a whole is tainted. Return pollution matters to the Environmental Protection Agency! Denationalize National! Liberate these last two hostage airports of the U.S. Home Rule for the Washington Airports!

By now the fact is really self-evident that National is a noise factory, and that the only counter-argument that can be offered is that it is more convenient to some of its users. High time then to examine two aspects of this defense.

First, let us quantify convenience for this Impact Statement by measuring both positive and negative impacts. Noise sensors and computers are impressive technology, even in the wrong hands, but noise is really a human problem. So each time a person finds National a convenience that counts as a positive impact; each time a person finds it a nuisance this is a negative impact. Now, of National's 15,000,000 passengers a year those who depart from it are more likely to pre-select it as a convenience than those who arrive from another city, such as tourists, who usually request a day, an hour, and an airline rather than a landing field. And we can say that even if those who depart from here had an equally rich choice of schedules at all three fields, and the better ground transportation this would provide, it is likely that at least one-third would still prefer National. So we have 5,000,000 positive personal impacts per year or in a generous scenario up to 10,000,000.

Consider now that each time a person is disturbed by a jet overhead there is a negative impact. With 350,000 operations currently per year let us be conservative and only count the takeoffs, which are noisier, for a factor of 175,000. And let us say that only 10% of the Washington area is impacted at home, work, or play at a given time for an average of 300,000 persons. The annual negative impacts per year become 52,500,000,000 which is a ratio of 5250 to one of negative inconvenience to positive convenience. Of course there are other ways of quantifying the noise incidence but you can begin to see why the FAA does not want to reduce the problem to human terms.

Finally, let's take an historical perspective of that central Potomac River location of National that makes it both such a public nuisance and convenience. We then find that a jet airport is not the first convenient nuisance . . . simply the most recent our River has put up with. For 200 years it was the most convenient place to dump garbage (over the side), to quarry stone (from the banks), and to empty sewage (piped or unpiped). But despite a long tradition of convenience to tens of thousands of people little such activity is currently allowed even though it has cost tens of millions to relocate these convenient nuisances elsewhere. There remains but one abuse of this River and its banks and that is the jet pollution which a few of our public servants this time are continuing to dump. But much like the starch and poison of the previous dumps, FAA mythology to the contrary, neither does jet pollution fall quietly to the bottom of the River. It trespasses far from the shore and seriously encroaches on our daily lives.

Insidiously, the historic Potomac Valley has been wrested from the people who want to live, work, and relax in peace and has become a 20 mile runway extension and Valley of Deafness. And as with the previous desecrations too many of our officials instead of boldly ending this dispossession prefer to defend it, to temporize, to trade off for other gains, and, if forced, only to promise "pie in the sky by and by." But this last great ravishment of the Potomac River will no more survive than previous attempts. The central metropolitan area of the nation's capitol is not, never has been, and never will be the rational, civilized location for a major airport and the sooner our leaders admit to this sin the sooner we will be on the way to resolve this scandal. I invite all to join, as our neighborhood has, the newly formed CAP (Coalition on Airport Problems) for all groups and individuals who want to make their frustration count. The FAA must be made to understand that we will never rest until they return to the people what they have taken from them. . . . Peaceful Skies Over the Potomac.

STATEMENT OF H. D. LEWIS, PRESIDENT, COMMITTEE FOR NATIONAL, AND THE
ARLINGTON CHAMBER OF COMMERCE

The Arlington Chamber of Commerce represents over 1,300 local businessmen and professionals. The Chamber, founded in 1924, is one of the larger voluntary membership organizations in the Commonwealth of Virginia.

There is a vocal minority in the Washington Metropolitan area which if it were able, would drastically restrict or even close down Washington National Airport. These individuals see Washington National only in terms of noise and pollution. The valuable service provided the traveling public and the economic importance of the facility to the community are completely ignored. As in many environmental encounters, we have an emotional minority which is demanding an action which could seriously impact a significant number of residents economically. With the rapid technological advances being made in aircraft noise and pollution suppression, local environmentalists will be hard-pressed in a few years to find an acceptable reason for closing down Washington National.

Few areas of the nation have a major airport so conveniently located and served by modern mass rail transportation. The facility is undoubtedly one of the most significant energy conservers in the area. Washington National has an excellent safety record and provides an unmatched convenient air transportation service for our Federal government, including Congress and the Executive branch.

On the economic side, Washington National serves two important roles. The airport is the major catalyst behind the intense development of Crystal City and Rosslyn. These two Northern Virginia areas represent an investment value of \$1.2 billion. As a direct result of Washington National's location, Northern Virginia has developed the largest travel industry in the State of Virginia, with over 5,000 motel rooms located in Arlington alone.

The other economic role of Washington National relates to the \$660 million it annually pumps into the local economy. It is the single largest on-site employer in Northern Virginia and the second largest in the State. The facility is one of the few Federal installations which operates without the support of tax dollars.

While we are basically in accord with FAA's proposed rules for the operation of Washington National, we urge the Committee to request that an economic impact study be made on any proposed rules which will restrict the future growth of the airport. The continued viable existence of this facility is of major concern to the residents of Northern Virginia, and it should not be subjected to unwarranted physical restrictions for the benefit of a vocal minority of the population.

We are in agreement with the continued Federal ownership and operation of Washington National. However, no opposition is expressed to the sale of the facility to the State of Virginia. Under no conditions should the airport be sold to a local government entity, authority or any combination of such entities or authorities. The latter transaction, in our opinion, would result in the quick demise of this important airport which serves millions of travelers with an unmatched degree of convenience and efficiency and makes a substantial contribution, both direct and indirect, to the local economy.

TESTIMONY OF JOHN W. HECHINGER, FORMER CHAIRMAN OF THE CITY COUNCIL OF THE DISTRICT OF COLUMBIA AND PRESENT DEMOCRATIC NATIONAL COMMITTEEMAN

National Airport is federally owned and operated—built on District of Columbia filled land in the Potomac river—and is a relic of the propeller age.

Like many other foresighted major communities in the United States, this metropolitan area saw the need of a major jet port and as a result Dulles was built in the 1960's. No other major city in the United States, such as Chicago, Kansas City, Dallas, Houston, and others, continue to use its antiquated propeller age airport the way Washington, D.C., uses National. None of them permit substantial jet traffic at the "close-in" airport. Here at National, they not only permit the use of jets, but jets use them almost to the total exclusion of our new jet port. Dulles is also federally owned and operated.

National Airport and Dulles Airport are the only two commercial airports in the country owned and operated by the Federal Government.

Life in our urban areas across the country is increasingly being damaged by pollution, but to allow expansion of National would be catastrophic pollution. Haven't we, through lack of planning, wrought enough havoc on our cities here on the ground? Shall we continue to add to the urban crisis in the third dimension?

The air space above a city should be in its control. The expansion of National must not be allowed. For today, the air pattern floods Washington with the fallout of noise.

Control of National and Dulles should be transferred to a regional authority like the Port Authority of New York so that local citizens can run their own airports as they do everywhere else in the United States.

I am a fourth generation Washingtonian. This continued abrogation in every direction of our birthright as U.S. citizens to govern ourselves is illustrated in its most exacerbated form in this encounter of the third kind through the lack of home

rule in our air space; home rule that is common to every other of the two hundred twenty-five million American citizens—all except for the three million people living in the Washington, D.C. metropolitan area.

It is absurd for the Administrator of the FAA and the Secretary of Transportation to be running these local airports. It is grossly inefficient—a great divergence of their time and talent. The present incumbents, Secretary Goldschmidt and Administrator Bond, agree that for them to be in charge of National and Dulles is a waste—their predecessors agreed with this assessment.

To illustrate that the shattering affect of aircraft noise is dangerous, no aircraft may enter the air space within a one-half-mile radius of the Naval Observatory so as not to damage the delicate instruments. I say, delicate instruments indeed!—what about people?

Control of National and Dulles should be transferred to a regional authority.

STATEMENT OF SENATOR CLIVE L. DUVAL, 2D

Mr. Chairman and Members of the Subcommittee, I appreciate very much the opportunity to appear before this distinguished Subcommittee to present my views on the Department of Transportation's Proposed Policy for Metropolitan Washington Airports and on other matters.

I am Senator Clive L. DuVal, 2d, representing the Arlington-Fairfax-Falls Church area of Northern Virginia. I am also President of a broadly-based citizens organization known as Virginians for Dulles with more than a thousand members spread along the Virginia shore of the Potomac from Alexandria through Arlington into McLean. We also have some members residing in the District of Columbia and Maryland.

Many of my constituents, whether as members of Virginians for Dulles or not, live under the wings of the jets utilizing National Airport. They are part of the many thousands of residents of the Metropolitan Washington Area who are constantly harassed by aircraft noise and have been condemned to exist in what can best be described as a noise slum.

In consequence, in 1970 Virginians for Dulles brought suit against the Federal Aviation Administration (FAA) in the United States District Court for the Eastern District of Virginia seeking to restrain the overutilization of National Airport by jet airliners and the air and noise pollution resulting from such overuse. Our suit was dismissed in the District Court but on appeal the United States Court of Appeals for the Fourth Circuit directed the FAA to submit an Environmental Impact Statement regarding its operation of Washington National and Dulles International Airports (Dulles). After lengthy delay, the FAA did file a Draft Environmental Impact Statement on March 21, 1978, but after hearings at which many witnesses representing local governments and citizen associations expressed strong opposition, no further action was taken in the matter by FAA. Subsequently, we moved to hold FAA in contempt of court for its disregard of the court's order in the above suit, resulting in the submission by FAA earlier this year of a Supplemental Environmental Impact Statement involving a new Proposed Policy for the Metropolitan Washington Airports, together with a Notice of Proposed Rule Making relating to Flight operations at National. FAA must submit a final Environmental Impact Statement and announce a new Policy for the Airports by August 15, 1980.

I am happy that your Subcommittee has taken a direct interest in a matter so vital to many thousand citizens of this area, and also to the many visitors to the Nation's Capital.

Our position on the Proposed Policy follows:

One of FAA's basic guidelines for other owners and operators of close-in airports, as set forth in FAA's document "Planning the Metropolitan Airport System" of May, 1980, provides in part that airport operational policies "must respond as nearly as possible to the desires, attitudes and values of the citizenry . . ." and that "Typical metropolitan bodies," which could best provide the policy direction are Councils of Governments . . .

As FAA well knows, we do have such a metropolitan-wide body here—the Washington Metropolitan Council of Governments (COG)—which on June 14, 1978, unanimously adopted a resolution (R25-78 as amended) calling for the following operational policies at National: A 50 percent reduction of air carrier slots by 1985; admission of widebodied aircraft on a 1 for 2 basis; reduction in the airport's curfew; limitation of the annual passenger level to a target of 14 million persons; all flights to and from National to be restricted to those with originating points or final destinations within 650 miles from the Airport; and creation of a Regional Advisory Board to address aviation issues in the Washington area.

Virginians for Dulles has strongly supported, and continues to support, these COG recommendations as the basic framework on which a new and rational operational policy for National should be based.

But, measured by them, FAA's plan for daytime operations at National as set forth in its new Proposed Policy and two alternatives are almost totally unsatisfactory and unacceptable.

We do commend and support FAA's Proposed Policy covering evening and night operations, under which air carriers will not be permitted to schedule operations after 9:30 p.m.; operations between 9:30 p.m. and 10:30 p.m. will be substantially reduced; and the airport will be closed to all traffic between 10:30 p.m. and 7:00 a.m., with late flights diverted to other airports. These actions would help significantly to reduce noise harassment for hundreds of thousands of residents of the metropolitan area during evening and night hours.

However, for two-thirds of each day during daytime hours, FAA's Proposed Policy will not provide any perceptible reduction of noise and air pollution for area residents for many years to come.

This is true because under all of FAA's new plans it continues the irrational policy of designating a small airport, designed as National was for propeller planes, as the principal jet airport for the metropolitan area. In contrast, Dulles International Airport was intended by Congress and designed to be the jetport for the Nation's Capital, and Baltimore-Washington International Airport is a large airport, which has recently been expanded and modernized by the State of Maryland.

Yet by the year 2000, National will still carry more passengers than either of the other two airports, and for almost another decade it will serve more passengers than both the other two combined.

For the period 1981-1985, FAA's proposed policy would place no present restrictions on passenger growth at National, which would be permitted to rise from the present level of 15 million per year to 18 million, to be reached around 1985. We find the 18 million figure arbitrary and mystifying, because the present Environmental Impact Statement contains not one word which attempts to justify this huge increase in passenger usage of National.

Noisewise, we find it intolerable and unacceptable that the Proposed Policy would do nothing of substance to reduce the current heavy burden on the metropolitan area during the daytime hours for the next five years. While there would be some reduction in noise during daytime hours by 1990, a major part of this noise reduction will result from the Federal program requiring either new and quieter planes in the nation's air fleet or by the installation of noise-abatement equipment on noisier planes, and not by transfer of flight operations from National to other airports.

As regards air pollution, we further protest the fact that, under the proposed FAA Policy, airport-related emissions would increase at and around National above existing levels, due in large part to the great increase in surface transportation necessitated by FAA's recommended increase in passenger use of National. Several pollution standards would be violated, and hydrocarbon violations would continue to occur at all receptor points around National.

With regard to the two alternative policies which FAA proposes for the operation of National—one being the so-called "Restricted Growth Policy" and the other the so-called "Expanded Growth Policy"—it is impossible to consider these policies as true alternatives.

These two policies are in part totally inconsistent with and contradictory of the viewpoints they are supposed to represent. For example, the "Restricted Growth Policy," which purports to represent the views of those who want use of National reduced, in fact, proposes a larger airport with substantially higher passenger levels and permits night-time operations at National, whereas under the "Expanded Growth Policy" the curfew would be strengthened and night flights reduced.

Frankly, we do not know whether these contradictions represent a deliberate effort to befuddle the public or whether they are simply another example of bureaucratic confusion. Whatever the explanation, we are prevented from basing our recommendations on FAA's so-called "Restricted Growth Policy," which we find is invalidated by numerous contradictions and inconsistencies, and we of course oppose the "Expanded Growth Policy."

It is our recommendation therefore:

(1) that the Proposed Policy's reduction in air carrier slots at National from the current 40 to 36 be considered a first step only, to be followed annually by further slot reductions, so as to reduce air carrier operations per hour from its current 40 to 20 by 1985. These slot reductions should be achieved in part by the introduction of wide-bodied jets on a 2 for 1 basis and by perimeter restrictions involving cancellation of the exemption for the "grandfather" cities and adoption of a true 650 mile

perimeter limiting flights to and from National Airport to points within that perimeter;

(2) that the Proposed Policy's plan for reduction of air carrier scheduling and operations during evening and night-time hours be adopted;

(3) that commuter carrier operations be increased from 8 to 12 per hour, and general aviation operations be continued at 12 operations per hour;

(4) that the annual total passenger level be limited so as not to exceed 14 million;

(5) that "extra sections" of scheduled shuttle service be included in the total limit on air carrier operations;

(6) that a regional Citizens Advisory Board be established to provide input to FAA on aviation policy questions in the metropolitan area, so that the views of the residents may be properly represented in the decision making process;

(7) that the Department of Transportation and Metro take action immediately to provide frequent and reliable bus service connecting Dulles with the District of Columbia and with National, and on a longer term basis make arrangements to connect Dulles by rail to the Metro rail system;

(8) that mandatory noise abatement procedures on landings and takeoffs at National should be emphasized and improved by FAA.

In our above recommendations, we align ourselves with the position, taken by the Metropolitan Washington Coalition on Airport Problems (CAP), of which we are a member.

I understand that another important issue before the Subcommittee is the question of the desirability of maintaining the Metropolitan Washington Airports as federally owned and operated entities.

Our position on this issue is that the ownership and operation of Washington National and Dulles International Airports by the FAA is highly undesirable because it clearly involves that Agency in a series of potential conflict of interest situations. By law, the FAA must in its ownership and operation of these two airports promote the interests of aviation, and the aviation industry has always urged intensive, expanded use of National, even if this means reduced utilization of Dulles and Baltimore-Washington International Airports. At the same time, FAA's statutory duty requires it to serve the interests of the general public—and in this instance many thousands of residents of the Washington Metropolitan area demand reduced utilization of National.

Another area of possible conflicts of interests arising out of FAA's ownership and operation of National and Dulles was pointed out by FAA Administrator Jack H. Shaffer some years ago, when he stated:

"... as airport proprietor he (the FAA Administrator) must of necessity negotiate and deal on a contractual basis with some of the same segments of the aviation industry that he regulates in his capacity as FAA Administrator."

Further, the concept of Federalism, which would give local governments a voice in those public matters in which they have a clear interest, would argue for allowing local governments to participate in supervising and regulating flight operations at Dulles and National.

For these reasons, both Congress and the Administration have in the past considered solutions which would remove FAA from the business of owning and operating airports: during the 91st Congress, second session, hearings were held in the Senate on S. 3128, introduced by Senator Spong of Virginia. This bill, in effect, authorized the States of Virginia and Maryland and the District of Columbia to enter into a compact for the purpose of establishing a Regional Authority to operate the three major airports within the Washington-Baltimore Areas. At that time Senator Spong pointed out that the Washington Metropolitan area "is the only metropolitan area in the Nation without some control over its airports." Some years back, the Nixon Administration also considered a solution similar to that proposed by Senator Spong.

For the reasons set forth above, we strongly favor a solution along the foregoing lines. That is, to avoid the potential conflicts of interest to which I have alluded and to conform to the concept of Federalism, Congress should authorize the States of Virginia and Maryland and the District of Columbia to establish a regional authority to own and operate Washington National Airport, Dulles International Airport and Baltimore-Washington International Airport.

TESTIMONY OF ERIC BERNTHAL, PRESIDENT, METROPOLITAN WASHINGTON COALITION FOR AIRPORT PROBLEMS; SHERWIN LANDFIELD, MEMBER OF EXECUTIVE COMMITTEE, VIRGINIANS FOR DULLES; CARRINGTON WILLIAMS, BOARD OF DIRECTORS, COMMITTEE FOR DULLES; AND H. D. LEWIS, PRESIDENT, COMMITTEE FOR NATIONAL, ARLINGTON CHAMBER OF COMMERCE

Mr. BERNTHAL. Thank you, Mr. Chairman. We appreciate your indulgence all day today. We know it has been a long day.

My name is Eric Bernthal.

Mr. ANDERSON. You ought to see the list we have for tomorrow. It is even longer.

Mr. BERNTHAL. I was just about to complain, Mr. Chairman, that 30 of our member organizations were told they cannot testify because they were members of CAP, and after sitting here today I am sympathetic with your decision.

Mr. ANDERSON. Here is the list they gave me for tomorrow, and then we have hearings on the 19th to complete the agenda, so you can appreciate that.

Mr. BERNTHAL. Mr. Chairman, the Metropolitan Washington Washington Coalition on Airport Problems (CAP) is an umbrella-organization consisting of more than 100 citizens' associations and groups from the Washington metropolitan area. CAP was formed to create, for the first time since jets were brought to National Airport 14 years ago, one unified citizens' voice, combining the experience and common concerns that tens of thousands of Washingtonians share over National Airport. Our members have studied, complained, lobbied, testified, and sued to establish a rational airport policy for this region.

More than anything else, this process has been marked by frustration for the citizens of Washington. As these hearings are held today, I am reminded of the testimony of a Virginia Senator:

If there is logic in the continued expansion of crowded National Airport—while nearby Dulles operates well below capacity—it escapes me. But the consequences of that development are all too clear—noise, pollution, and safety hazards over the residential areas surrounding National, and growing inconvenience and delays for those who use its facilities.

These sentiments were echoed by most of the other 36 witnesses who testified—at congressional hearings, on this very same subject, 11 years ago.

Eleven years ago the traffic at National Airport was at such dangerously high levels, the environmental impact of National so severe, that the Senate held hearings to question the future role of National Airport. Thousands of area residents found the simple enjoyment of their homes and yards to be nothing but a memory; the incessant overflights—up to 300 a day, both north and south of the airport—became a constant intrusion into people's lives; and Washingtonian Magazine was prompted to describe National Airport as "the great filthy beast of the Potomac."

That was more than a decade ago. Since then, National Airport's passenger volume—already at a record 10 million passengers per year—has increased to 16 million, more than a 50-percent increase over that unacceptable level. Dulles Airport, built with Federal funds in 1962 to be Washington's primary jetport, continues to handle no more than 15 percent of the commercial jet traffic in our

region; indeed, Dulles has fewer commercial jet flights today than it did 10 years ago.

For its part, FAA will finally be issuing an environmental impact statement on National Airport this fall—but only under threat of a contempt-of-court citation, and a full 7 years after its first draft. All calls for rational policymaking have been ignored. The Environmental Protection Agency has protested again and again that National Airport is grossly overutilized; the Department of the Interior has called for a major reduction in air traffic at National; the National Park Service has warned that our Nation's most cherished monuments, the Lincoln and Jefferson Memorials, are literally falling apart from the vibration and pollution which is rained down on them hundreds of times each day; the Metropolitan Washington Council of Governments continues to call for a wholesale transfer of flights from National to Dulles and BWI and has lamented the "accident of history" that has made this the only metropolitan area in the United States which does not control its own airports. And the National Capital Planning Commission, from whom you will be hearing I guess tomorrow, has called for the closing of National Airport altogether.

We have spent literally hundreds of hours in analyzing the National Airport problem. I am submitting for the record the comments of our organization which we submitted in the FAA's rule-making proceeding on Washington airports policy. That is this document here, Mr. Chairman. I submitted copies. Do you have this? It is a rather lengthy document.

Mr. ANDERSON. We have it, and without objection it will be placed in the record at this point.

[The information follows:]

Before the
FEDERAL AVIATION ADMINISTRATION
Washington, D.C.

In the Matter of)
)
Consideration of the)
)
Notice of Proposed Policy)
Notice of Proposed Rulemaking)
and)
Supplement to the Draft)
Environmental Impact Statement)
(January, 1980))
on)
)
METROPOLITAN WASHINGTON AIRPORTS)

Dockets No. 19948-50

COMMENTS OF THE METROPOLITAN WASHINGTON
COALITION ON AIRPORT PROBLEMS ("CAP")

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April 15, 1980

Before the
FEDERAL AVIATION ADMINISTRATION
Washington, D.C.

In the Matter of

Consideration of the	)	
Notice of Proposed Policy	)	
Notice of Proposed Rulemaking	)	
and	)	Dockets No. 19948-50
Supplement to the Draft	)	
Environmental Impact Statement]	)	
(January, 1980)	)	
on	)	
METROPOLITAN WASHINGTON AIRPORTS	)	

COMMENTS OF THE METROPOLITAN WASHINGTON
COALITION ON AIRPORT PROBLEMS ("CAP")

The Metropolitan Washington Coalition on Airport Problems ("CAP") is a recently-formed coalition of more than 100 citizens' organizations and associations located throughout the metropolitan Washington region. CAP's member organizations have as their common denominator a vital, personal interest -- on behalf of their respective member constituents -- in the operation of Washington National Airport ("WNA"). The tens of thousands of citizens who are represented through CAP -- people who live north, south, east and west of WNA -- experience the noise and air pollution burdens, and are exposed to the air safety hazards, which the operation of WNA generates. On their behalf, CAP hereby submits its comments on FAA's Supplement to its March,

1978, Draft Environmental Impact Statement, and the above-captioned Proposed Rulemaking and Proposed Policy for the future operation of the Metropolitan Washington Airports.^{1/}

Summary of CAP's Position on the
DEIS and Proposed Airports Policy

These comments will set forth in some detail CAP's views on the DEIS Supplement and FAA's proposed airports policy. The comments will be divided into three general sections: (i) comments on the adequacy of the DEIS as an analysis of the environmental impact of WNA; (ii) comments on FAA's proposed airports policy; and (iii) CAP's suggestions for a more effective policy to govern the operation of this region's airports.

The DEIS. FAA's Supplement to its March, 1978 DEIS is a disappointing document. It continues woefully to understate the breadth and intensity of the environmental impact of WNA on residents of the Washington region: it fails totally to consider the impact on most affected residents in suburban Maryland and Virginia, even though this same deficiency was called to FAA's attention in March, 1978; it

^{1/} CAP also submitted oral testimony in this proceeding on March 20, 1980, as did several of CAP's member organizations.

utilizes a measurement tool -- the Noise Exposure Forecast ("NEF") -- which seriously undervalues the true noise impact of WNA because it "averages" noise and fails to consider the fact that WNA is operational only during part of the 24-hour day; as in 1978, the Supplement again completely sidesteps the question of evaluating the air pollution impact in the Potomac River corridor, where all WNA jet traffic operates; the DEIS fails to make any comparative analysis of the environmental impacts of WNA and Dulles International Airport ("IAD"), or a comparative evaluation of the impact of noise as a series of daily intrusions into peoples' lives, as opposed to a cumulative noise exposure; and most importantly, the DEIS Supplement has failed to give consideration to the policy alternative which is the objective of the vast majority of area governments and citizens: a 50% or greater reduction in commercial jet traffic at WNA.

The Proposed Policy. FAA's proposed policy is based on laudable objectives, but is ill-designed to meet them. There can be no meaningful noise and pollution reduction at WNA with the modest four-slot-per-hour cutback envisioned by FAA. Moreover, future reductions at WNA are premised on the use of wide-bodied aircraft, a use which has yet to be demonstrated. More fundamentally, the wide-bodies are simply

not the noise panacea that FAA implies, and they will not bring meaningful noise reductions -- only fewer aircraft can do that. FAA's notions for future slot reductions are unnecessarily and inappropriately vague: they portend no meaningful noise relief at WNA -- even assuming optimum use of widebodies -- anytime up to and including 1990. Moreover, the failure to have defined slot reductions, phased-in on a fixed schedule over the next few years, offers the airlines nothing certain to plan around. Most seriously, FAA's modest slot reduction proposal will do nothing to encourage -- or require -- the airlines to take the long overdue step of developing their facilities at IAD and Baltimore-Washington International ("BWI"), and commence the wholesale transfer of flights to those facilities.

As to other aspects of FAA's policy proposal, CAP endorses the much-needed curfew proposal, while opposing the extension of the 650-mile WNA stage-length perimeter to 1,000 miles. The 18,000,000 passenger ceiling at WNA is totally inappropriate, as FAA has permitted WNA to "grow like topsy" over the years to its present 15,500,000-per-year passenger level. At 14,000,000 passengers in 1978, WNA was grossly overutilized; a limit at 14,000,000, with

phased-in reductions effected as slots are eliminated, was a sound policy then, and allowing a 30% increase in passenger levels over those of 1978 before any cap is placed on passenger traffic at WNA is not rational planning.

The fundamental flaw in the proposed policy is that it is premised on growth for WNA. Growth -- whether "restricted", "managed" or "expanded", to use FAA's terms -- is irrational at an airport which was built in 1941 to handle piston-engine aircraft, but now handles nearly 70% of the region's jet traffic. As a policy matter, CAP has considered the arguments supporting the present and proposed continued primary reliance on WNA as the region's jetport, and CAP believes there is no argument -- including the ostensible "convenience" of WNA -- which supports this gross overutilization of WNA. Other arguments -- the "National" nature of WNA, the supposed economic impact of a radical reduction in the use of WNA, and the need to rely on the marketplace -- are clearly specious, and will not withstand honest analysis.

CAP's Policy Proposals. CAP's policy proposals are designed to permit an orderly transition from reliance on WNA as our primary jetport to a truly balanced use of WNA, IAD and BWI. This policy is premised on the notion that

(i) the airlines cannot be expected voluntarily to make the capital expenditures and incur the operational costs attendant to a true, three-airport operation (even in the face of such positive incentives as "noise charges" as proposed by the President's Council on Wage and Price Stability ("COWPS"), and (ii) a policy must be developed that permits the airlines to plan around a known, stable future for WNA, while bringing the Washington regional community into a meaningful role in determining how its airports are operated.

Specifically, CAF calls for the following:

1. An immediate end to "growth" at WNA. Passenger and jet operation levels have been permitted to reach dangerous levels as this debate has dragged on through the years. An immediate growth freeze at WNA is essential while a new policy is phased-in.
2. A 50% reduction in jet slots. No meaningful noise relief can be attained without a reduction of at least 50% of the commercial jet operations at WNA. This view is shared by the Metropolitan Washington Council of Governments ("COC"), virtually every area jurisdiction, hundreds of citizens' organizations in the region, and tens of thousands of residents who live with WNA now. The reduction could be comfortably phased-in in three years' time.
3. Curfew. The FAA curfew proposal is a sound one which should be adopted as proposed, thus eliminating all late evening and night jet operations, and reducing the "bunching" of operations at the end of the scheduled day. The 7:00 a.m. morning ban should be extended to 8:00 a.m. on weekends.
4. Mandatory Noise Abatement Techniques. No policy consideration has been given to operational techniques which could assist in noise abatement. These include the Air Transport Association's ("ATA")

recommended climb mode; deferring the reapplication of full power on take-off to 15 miles DME; and an increase of required glide slopes on descent, consistent with safety considerations.

5. Citizens' Advisory Committee. It is an accident of history that the residents of the Washington region have no say in the operation of their airports. A Citizens' Advisory Committee -- with participation by affected citizens' organizations, as well as COG and the FAA itself -- is needed to permit the continuing development of rational airport planning policy for WNA, and to help generate the stability in operation of that airport which has been lacking during the past decade of lawsuits, legislation, and politicking for policy change.
6. Restricted Introduction of Wide-Bodies. Wide-bodied aircraft should be introduced at WNA -- assuming, as FAA does, that safe operation can be established -- only on a 1-for-2 basis. Airlines should be required to remove two narrow-bodied jet aircraft for every wide-body they introduce. FAA's own statistics show that wide-bodies are not significantly quieter than the 727-200's and DC-9's which use WNA now. Wide-bodies reduce noise only if they take more aircraft out of the sky than they add.
7. Better Access to Dulles. Changes in regional residential and work patterns have made IAD far more convenient to use -- if flights were available there. However, better access is plainly needed. Long-term, high speed rail is the answer; in the short run, I-66 linkup, improved bus service, and helicopter service should be considered.
8. Retention of the 650-mile limit. Increasing the stage length at WNA to 1,000 miles only exacerbates the pressure for more operations at WNA. Birmingham, Houston and New Orleans pressure for service to WNA, but such pressure is the very reason to retain the present perimeter: it is not service to Washington that they are denied; it is only the requirement that they use IAD or BWI. The "grandfather" status of seven cities outside the present perimeter does not justify making a bad situation worse.

9. Development of Equitable Flight Paths. FAA has completely sidestepped the issue of flight paths in developing airport policy. The unavoidable fact remains, however, that the planes -- however many there are -- must fly somewhere, and where they fly can make a great difference in their noise impact. CAP strongly endorses the concept of a broad-dispersal flight path, like that used at virtually all other American airports. In recommending such flight paths for WNA, however, CAP emphasizes that flight path policy changes in no way mitigate FAA's obligation to establish a more rational overall airport operational policy.

Fair-minded consideration of factors of health, safety, and environmental impact mandates a policy patterned on these concepts.

I. The Supplement to the DEIS Grossly Understates The Environmental Impact of WNA

The "Magic Minute": FAA's Use of NEF Is Inaccurate and Misleading

The most fundamental finding which FAA's Supplement to its Draft EIS must make is a delineation of the "noise footprint", or noise exposure area, which exists under various types of operational policies. The manner in which FAA has used NEF to accomplish this task is seriously misleading: NEF is a noise-averaging technique which arbitrarily assigns a "penalty" -- by a factor of 17 -- to jet operations after 10:00 p.m. This

penalty is based on the common-sense proposition that operations at night are more irritating than during the day, due to lower ambient noise levels and the desire of people to rest in quiet. While the concept is fair enough, it has been applied with gross unfairness in the DEIS, and again in the January, 1980 Supplement ("SDEIS")

The SDEIS provides the benefit of the FAA's proposed curfew to FAA's favored policy. This eliminates late-night, post-10:00 p.m. operations, and thus eliminates the 17x "penalty" which would extend the NEF contour much farther. However, in considering more restrictive policy alternatives -- less growth for WNA -- FAA has not provided the same benefit. Instead, FAA has assumed that late-night flights will continue as they do now, thus imposing upon this alternative the gross computational penalty of the many nighttime operations currently using WNA.

What is the objective here? If FAA seeks true analysis, the curfew "benefit" must be applied to all alternatives, not just to that policy choice which FAA favors. Only then can a fair comparison of noise footprints be made. The conclusion is inescapable, however, that this SDEIS simply serves to substantiate the FAA policy choice: in March, 1978, this same inconsistency -- then using comparative L_{DN} figures -- was called to FAA's attention; yet this deception is repeated.

As FAA points out, however, the deception is greater this time around: NEF uses a nighttime "penalty" factor of 17,^{2/} as compared to the factor of 10 used for L_{DN}.

NEF is a questionable analytical tool in assessing the noise impact of WNA: it assumes a 24-hour per day operation, and like L_{DN} which preceded it in 1978, NEF averages noise impacts. As one CAP member noted in his comments to the 1978 DEIS, this is like putting one's feet in fire and hands in ice and announcing that his average temperature is fine.^{3/} Whatever its shortcomings, however, it must be applied in an even-handed way in order to create any honest comparison of policy alternatives. This was not done in 1978; it was not done again in the SDEIS. Finally, there is a serious question as to the accuracy of the NEF computations even for depicting present-day impacts on NEF's own terms: Montgomery County's Department of Environmental Protection's actual measurement analysis shows that the NEF-30 contour in fact extends more than two miles further than the SDEIS indicates;^{4/} put another way, the NEF contour as depicted in the SDEIS is understated

^{2/} See SDEIS, p. III-1.

^{3/} Comments of Charles Weller to DEIS, June, 1978.

^{4/} See Comments of Montgomery County, Maryland, Department of Environmental Protection, p.1.

by nearly 40%.

CAP does not seek to engage in an esoteric discussion of noise descriptor methodology.^{5/} It seems elemental, however, that whatever descriptor is used, FAA should (i) apply the descriptor in a fair and even-handed manner so as to avoid gross comparative distortions between various policy alternatives, and (ii) utilize the descriptor accurately. The DEIS, and the SDEIS, do neither.

The SDEIS Again Completely Ignores
The Noise Impacts of WNA on Suburban
Maryland and Virginia

It is important to resist the tendency to be mesmerized by measurements and dazzled by descriptors, and be sure instead to see the forest for the trees: the SDEIS -- like the March, 1978 DEIS which preceded it -- completely ignores the impact of WNA operations on suburban Maryland and Virginia.

^{5/} Recognizing the value of a "noise footprint", and the need for some kind of descriptor, CAP sees greater benefits in the use of L₅₀, if only because the penalty factor for nighttime flights is absent and the gross distortion attendant to the "magic minute" curfew penalty is removed. Any measurement tool to delineate WNA aircraft noise should focus on these components:

- the number of times each day that human beings are subjected to noise levels of 60 dBA and higher;
- the number of times each day this noise level is attributable to aircraft overflights; and
- the extent to which this noise level is attributable to aircraft -- the "aircraft increment".

It is remarkable and discouraging that FAA can be itself located in the Washington region, dealing with angry and organized citizens' associations located in Virginia and Maryland,^{6/} and at the same time deny the existence of a severe WNA-generated noise problem in those areas. The plain fact is that aircraft noise impacts from WNA represent the largest single problem confronting tens of thousands of these area residents: the Potomac Valley League ("PVL"), a CAP member organization which itself is composed of 27 citizens' associations located along the Potomac River corridor, conducted a survey of residents in the Potomac Valley/Palisades area to determine the positive and negative elements of living in their communities. The results showed that, south of the Beltway, 80.5% of the respondents cited aircraft noise as the major problem adversely affecting the quality of their lives. The PVL survey concluded that "[a]ircraft noise proved to be of overwhelming concern to the entire area, with 71 percent of all neighborhood respondents citing it as a major problem." Indeed, aircraft noise ranked

^{6/} One CAP member organization, Virginia-based "Virginians for Dulles", brought the very lawsuit -- nearly 10 years ago -- which forced FAA to develop the Environmental Impact Statement now under consideration. FAA has been pestered, prodded and sued by other area organizations from Cabin John, Maryland to the north to Accokeek, Maryland to the south. CAP member organizations like MCCAN (Maryland Citizens Concerned About Aircraft Noise) and Quiet Skies represent residents living up to ten miles or more from WNA.

higher than high taxes, and was the single most oft-cited problem mentioned by area respondents.^{7/}

It simply should not take a citizen-conducted survey, expensive FAA-installed monitoring equipment, or repeated -- but unheeded -- comments in rulemaking proceedings to convince FAA of something it must already know: the WNA-generated aircraft noise problem in Maryland and Virginia is severe; it extends more than ten miles to the north, and several miles to the south, of WNA; and it is an inevitable consequence of operating an inner-city airport as a major regional jetport. No number of multi-colored, fold-out maps and SDEIS charts and tables can obfuscate the basic fact that FAA continues to ignore the true geographic scope of WNA jet noise impact.^{8/}

^{7/} Interestingly, more than 42% of the respondents in the PVL survey have lived in their residences for more than 16 years. An additional 37% have lived in their residences from 6 to 15 years. PVL Survey, Table 2. Thus, nearly 80% of the respondents are long-term residents. This belies the irrelevant but persistent notion that Potomac River corridor residents have no "right" to complain, since "if they didn't like the noise, they shouldn't have moved in there." As Mayor Charles Beatley of Alexandria noted in his oral comments in this proceeding, "many of us were here first", before WNA's jet era began some 14 years ago.

^{8/} It appears that this blatant inadequacy in the March, 1978 DEIS was not cured at all. Instead, the SDEIS merely contains the following additional sentence, following its description of the NEF 30 contour: "In addition, there are several residential areas outside of the NEF 30 contour where many residents still find the level of aircraft noise as intrusive and annoying." SDEIS, pp. III-9-10. This is, as a matter of law, an inadequate examination of the problem.

The SDEIS Perpetuates The Rain Dance
Around The Question of Air Pollution

In its March, 1978 DEIS, FAA noted the presence of air quality standard violations at WNA (and, to a lesser extent, at IAD), but concluded that "in comparing these emissions to the total metropolitan emissions, it can be seen that aircraft at National Airport do not contribute significantly to regional air pollution."^{9/} Comments on the DEIS pointed out the obvious flaw in this conclusion: FAA had compared aircraft emissions to total regional air pollutants, and found no significant relationship; but jet aircraft to and from WNA do not fly over the entire region. At present, they continue concentrate all noise -- and air pollution -- over a highly constricted corridor up and down the Potomac River. Thus, any honest analysis of WNA's contribution to air pollution in our area must assess its impact relative to the Potomac River corridor -- not the Washington metropolitan region.

Despite this obvious shortcoming in March, 1978, FAA's SDEIS makes no changes: "the methodology and sources of information used as a basis for air quality impact analysis are the same as those presented in the March, 1978 Draft EIS."^{10/} Now, as then, we simply cannot and do not know the air pollution

^{9/} DEIS, p. 127.

^{10/} SDEIS, p. III-19.

contribution of WNA-related jet aircraft. And while FAA concedes that air quality standards are presently violated at receptor points near WNA, and will continue to be violated under its proposed policy,^{11/} the true scope of air pollution impact from jets remains totally unstudied in the Potomac River corridor.

The Ignored Environmental Impacts:
Health and Emotional Stress

In a time when the Environmental Protection Agency is emphasizing the health-related aspects of noise and studies of the health impacts of noise are flowering,^{12/} the DEIS and the SDEIS continue to overlook the impact of aircraft noise beyond measurement of decibel levels and plotting of noise contours. This is a serious impediment to a fair assessment of the impact of WNA as an inner-city airport. The health impacts of noise are becoming better known all the time; the emotional stress of aircraft noise has been examined, but never in the Washington "preferential" flight corridor, where these impacts are genuinely severe.

^{11/} SDEIS, p. III-23.

^{12/} See, e.g., "Health and Noise", by Luther Terry, M.D. (former Surgeon General of the United States, in EPA Journal, Vol. 5, No. 9, p. 10.

The failure to address the health and stress aspects of WNA-generated jet noise is especially serious because it precludes a fair impact comparison with IAD. To state the obvious, the most striking distinction between WNA and IAD is their respective settings; urban WNA deposits its noise pollution on people far more than the same number of operations at IAD would. Thus, in establishing an airports policy, there simply must be some mechanism to evaluate the seriousness of the health and stress hazards to people -- the tens of thousands of people who are exposed to the 600 daily jet operations at WNA. Only after such an assessment can a rational policy be developed to determine the need for reductions in those operations, and the relative costs and benefits of transferring substantial numbers of those operations to IAD.

In this regard, it is especially important to emphasize the need to examine the impact of repeated overflights over the same group of people. This is not a question of decibel levels, but rather the impact that literally hundreds of intrusions on peoples' daily lives create. As COG noted in its 1978 comments in this proceeding, "[s]tudies of the impacts of aircraft noise on people indicate that the frequency with which activities are interrupted is a major factor in the

degree of annoyance which is experienced." This "major factor" has again been ignored in the SDEIS, as has been any evaluation of its impact on the health and emotional well-being of area residents subjected to repeated WNA-generated overflights.

The Total Absence of Comparative Impact
Evaluation Precludes Rational Policymaking

The failure to compare the impact of noise as a stress on human health and emotion with the mere physical presence of noise in relatively uninhabited or sparsely-settled areas is only symptomatic of a more fundamental shortcoming in the DEIS and SDEIS. There is simply no meaningful comparative impact evaluation whatsoever.

Historic and 4(f) Lands. Nowhere is the absence of comparative impact more deleterious to a meaningful environmental assessment than in the DEIS, and SDEIS, failure to compare what jet noise does to historic and 4(f) lands. The DEIS trumpeted the truism that "[t]he colorful and proud history of our country is reflected in the large number of historic structures, places, districts and monuments."^{13/} It contains an impressive cataloging of some of our national treasures, which are the pride and symbols of this region. But nowhere has the obvious been stated: WNA has ruined or radically diminished the ability of citizens of this country to see and

^{13/} DEIS, p. 155.

enjoy these great landmarks; concerts by the Potomac River are only a memory; trips to the Lincoln and Jefferson Memorials can be literally painful; and the general value of our federal district in Washington -- one of the most beautiful and treasured areas in the nation -- is seriously debased by hundreds of jet overflights from WNA every day. In addition to the tens of thousands of affected area residents, the numbers of affected visitors to our nation's capital who must contend with WNA-generated jet noise is staggering:

Lincoln Memorial	3.5 million visitors per year
Jefferson Memorial	1.5 million visitors per year
Iwo Jima Memorial	1.9 million visitors per year ^{14/}

The Department of Interior further points to "accelerated structural deterioration due to noise-induced vibrations," and asks FAA to address this problem -- the destruction of our national shrines -- and the degree to which this debasement is necessary and/or unpreventable as a matter of airports' operational policy. ^{15/}

^{14/} See also, comments of CAP member Parkway Citizens' Association submitted in this proceeding, which provides further statistical data on the number of visitors to the Washington area who must contend with WNA jet noise.

^{15/} See Comments of Acting Assistant Secretary of the Interior David F. Hales, August 1, 1978, p. 3. The Department of the Interior also discusses the health aspects of WNA-generated noise, referred to above:

"Along these same lines, it is known that hearing loss in humans can occur from prolonged exposure to sound above certain levels. In the interest of safeguarding the health of Federal employees, we are concerned about the effects of present and projected levels of noise on hearing perception. The final statement should also address this problem."

^{Id.}

By stark contrast, the DEIS identifies only one building which is on the National Register and is located within the 30 NEF contour of IAD: the Sully Plantation, located on Dulles Airport property.^{16/} IAD is simply not located in an area where hundreds of thousands of people live and work, or where millions more sightsee every year. It is not placed in the middle of perhaps the most historic area in the United States; its very design inherently minimizes the noise impact the airport will have on those who do live or work near it.

Nonetheless, neither the DEIS -- nor the SDEIS, which offers no further analytical contribution on the question of ^{17/} 4(f) land impacts, attempts any comparison of the relative impacts of WNA and IAD jet noise, or the comparative consequences of policy alternatives. Because the differences are so stark, any policy which fails to consider these comparative impacts cannot be deemed, by any measure, to be an adequate or honest evaluation of alternatives.

Surface Access Analysis. A failure to compare surface access to the two facilities, and the degree to which transport

^{16/} See DEIS, Table V-29.

^{17/} The SDEIS is content to point out that, (i) because WNA is an "ongoing" federal action, no approval for its operation is needed under §4(f) of the DOT Act of 1966, and (ii) the proposed policy would "result in a reduction in cumulative noise levels at all parks, recreation areas, and historic sites in the vicinity of National Airport." SDEIS, pp. III-23-24.

to and from WNA and IAD is relatively affected by airport policy, is another example of the abject absence of any meaningful data on which to predicate a policy determination. In this area, the SDEIS perpetuates both the failure adequately to assess the traffic flow impact of WNA and to compare it to the traffic flow congestion which would be generated under a different operational policy which favored IAD.^{18/}

Just as the DEIS omitted the true noise impact of WNA on much of the Washington metropolitan area, its surface access impact analysis was also too narrow in scope. By focusing only on the area within 0.5 miles of WNA, the DEIS omitted consideration of one critical fact: users of WNA must traverse the basic Washington, D.C. commuter routes to reach WNA. Airports generate area-wide traffic flows; cars do not suddenly appear at airport entranceways. Neither the DEIS, nor the SDEIS, has looked at WNA's impact beyond the immediate vicinity, despite the fact that all vehicles to WNA must essentially commute to downtown to get there, adding to incredibly overburdened roads in the region.

Similarly, the objectionable failure to assess the true traffic impact of WNA is badly compounded by the absence of a

^{18/} This is another example of a shortcoming in the DEIS which was pointed out to FAA in comments, but which was not addressed in the SDEIS.

comparative analysis of the impact of WNA versus the impact of IAD on area traffic. In this regard, there is simply no gain-saying the fact that vehicular traffic heading to or from WNA must compete for already-congested highway space used by Washington, D.C.-bound traffic,^{19/} while Dulles traffic -- from virtually anywhere in the Metropolitan area -- has an available route which circumvents or by-passes Washington. How can one fairly assess the costs and benefits of different alternatives without recognizing -- and evaluating -- the fundamental difference that every WNA-bound car must fight traffic to get there, when IAD-bound traffic generally flows against regional traffic?

Noise impact on Human Beings. While the absence of comparative analysis of WNA and IAD-impacts on 4(f) lands and surface transportation point out obvious deficiencies in the DEIS and SDEIS, none is so blatant as the failure to compare the relative impact on human beings. This shortcoming has been discussed above and will not be repeated here, except to say that one cannot accept either of these impact statements as a legally-sufficient document, worthy of a basis for planning purposes, without some comparative analysis of noise which bombards people as opposed to noise which impacts pastures and woods.

^{19/} The DEIS shows that 80% of WNA-bound traffic utilizes the George Washington Memorial Parkway, a major commuting arterial. See DEIS, pp. 102-3. Similarly, because of WNA's proximity to downtown, any WNA-bound vehicle -- from Fairfax, Montgomery, or Prince George's County -- must utilize basic commuter routes to get there.

Doublespeak and the Failure to
Consider True Alternatives: The
Disappearance of "Case 32"

Of all the shortcomings of the SDEIS, none is more glaring than the very premise of the SDEIS itself and the resulting "policy alternatives". FAA analyzed the comments to the 1978 DEIS as revealing "sharp differences of opinion on the role" of WNA. These differences broke down largely between local and national commenters; Washington regional residents, governmental entities and representatives expressed "the strong view that, with two other air carrier airports available in the region, the concentration of air carrier activity at National is an unwarranted and unnecessary burden on the airport neighbors who are subject to high levels of aircraft noise." Those who commented but did not live in this area largely urged that WNA maintain a "national role" in light of WNA's "uniquely convenient location."^{20/} In view of this polarization of perspectives, FAA believed that a further study was appropriate.

According to FAA, nearly 62% of those commenting in 1978 felt that the proposal set forth in the DEIS was "not restrictive enough".^{21/} Incredibly, the alternative originally studied by

^{20/} SDEIS, p. II-12.

^{21/} Id., Table II-2. Some 710 comments were received by FAA in 1978 which, according to FAA's tabulation, represented this point of view out of the total of 1,155 comments.

FAA which fairly represented this point of view -- the so-called "Case 32" alternative, which called for a 50% reduction in the number of commercial jet operations at WNA -- was dropped altogether in the SDEIS. In its stead appears the alternative labelled by FAA as the "Restricted Growth at National Alternative".

The "Restricted Growth" alternative, which represents one "extreme" position in the SDEIS, stands the position of the majority of commenters in 1978 on its head: by the hundreds, interested parties commented that WNA was grossly overutilized, and should experience a substantial cutback in jet operations; and while "Case 32" in the original draft ^{22/} evaluated this 50% cutback alternative, the SDEIS "restricted growth" alternative does just the opposite. It posits more growth at WNA, merely at a slower rate than that indicated by the FAA's favored policy.

This is, to be blunt, outrageous. Casting aside for a moment the failures to evaluate the impact of WNA in Maryland and Virginia, the legerdemain by which NEF is unfairly applied to benefit the favored policy but not the alternatives, and the air pollution "rain dance" which avoids that subject altogether,

^{22/} This is not to suggest that "Case 32" was fairly presented or evaluated in the DEIS. To the contrary, "Case 32" was denied the mathematical "benefits" of the curfew in the DEIS, so that FAA was able to generate the conclusion that "the noise exposure values of the proposed policy and Case 32 are virtually the same." DEIS, p. 238. This, despite the fact that the policy proposed then called for a 30% increase in WNA jet operations. See Comments of MCCAN, pp. 27-28, to DEIS.

the most questionable aspect of the SDEIS -- and the policy which emerges from it -- is that the alternative favored by the majority of commenters in 1978 was not considered at all.

The 50% cutback alternative was anything but a "radical" proposal: it was favored by a majority of commenters in 1978; the vast majority of oral commenters in 1980 have taken that position;^{23/} it was, and remains, the position of COG, an organization whose positions are ostensibly of especial value to FAA in determining regional positions on airport policy;^{24/} and it represents a far less drastic reduction in the use of WNA than is recommended by another federal agency, the National Capital Planning Commission -- which calls for the closing of WNA by 1990.^{25/} Nonetheless, this alternative was dropped entirely in the SDEIS, replaced by three growth alternatives.

^{23/} CAP did not tabulate or categorize the positions of those who commented on the proposed policy at the March 20, 25 and 27, 1980, public hearings. It would appear a fair comment, however, that more than 75% of those who commented favored at least a 50% reduction in the use of WNA by commercial jets.

^{24/} FAA has characterized its view of COG in this way:

The Board of Directors of COG is comprised of elected representatives from state, county, and municipal governments in the Metropolitan Washington area. As elected representatives, the FAA looks to the COG Board of Directors for a clear expression of the desires of the citizens in the Washington area in regard to the operation of Washington National and Dulles International Airports.

See "Metropolitan Washington Airports/Environmental Assessment/ Test of the Extension of the Turbojet Departure Flight Path South from Washington National Airport," Piscataway Hills v. FAA, Civil Action No. 79-2041, U.S.D.C., District of Columbia.

^{25/} The Washington Post, April 12, 1980, p. B-1.

In short, the "restricted growth" alternative does not "reflect the local perspective", as indicated in the SDEIS;^{26/} it is almost the diametric opposite of regional will. Far from the refined study that the SDEIS purports to be, the elimination in that document of the only alternative which was acceptable to the vast majority of commenters -- both in 1978 and today -- damns the document as an incomplete, and apparently insincere, attempt to develop a truly rational and balanced policy for the operation of WNA.

II. FAA's Policy Proposal Cannot Accomplish
Either Meaningful Noise Reduction Or A
Rational Role For WNA by 1990

In its comments, CAP has attempted to show that the SDEIS is an inadequate study of the environmental impact of WNA. Perhaps because of these deficiencies, FAA has proposed a policy which seeks to effect some noise reductions for WNA's neighbors, and to effect "a more balanced utilization among the regional air carrier airports,"^{27/} but which can in fact accomplish neither.

^{26/} SDEIS, p. II-12.

^{27/} SDEIS, p. II-6.

The Four-Slot-Per-Hour Reduction Will
Bring No Meaningful Noise Relief

The proposed reduction in commercial air carrier slots from the present 40 per hour to 36 per hour, with future possible reductions if aircraft mix and passenger volume warrant, is simply not enough of a step in the right direction to effect any of the noise relief which is intended.

As dozens of commenters have pointed out orally to FAA in the March 20-23-27, 1980 hearings, eliminating four jet slots may affect certain statistical data, such as L_{DN} or NEF, but common-sense makes obvious the fact that it will be literally unnoticed by the beleaguered Washington area residents who live with hundreds of jet overflights every day. As a practical matter, this means that there will be two fewer overflights an hour over any given location -- a reduction from 20 scheduled jet overflights to 18. Does FAA seriously contend that anyone will notice a cutback from 20 jets to 18 jets, every hour that the airport is open, every day of the week?

There is, of course, the little-noticed fact that by requiring "air commuters" to use commuter slots only under the FAA proposal, there will not even be a four-per-hour cutback of jet operations: at present, some 20 piston-engine commuter aircraft utilize air carrier (jet) slots, because

commuter slots are otherwise full. Since they will have to give these 20 slots "back" to the air carriers -- more than one per hour -- the actual "reduction" in jet slots is, in fact, three per hour rather than four. Playing with numbers (as this proposal does), one may therefore conclude that the reduction in jet air carrier slots is actually 25% smaller than FAA is^{28/}suggesting to the public.

The fact that the reduction is actually three, rather than four, jet slots, obscures a more fundamental point: the proposal does not seek a reduction at all, but rather a transfer of slots from air carriers (jets) to air commuters (propeller aircraft). While CAP believes that WNA is obviously more suited to non-jet aircraft for environmental reasons, we must strongly question FAA's insistence that the intense overuse and overcrowding of WNA -- and the skies around it -- must be continued with some type of aircraft. Is there no room for consideration of another alternative -- the reduction of air carrier slots without a transfer of these slots to some other class of aircraft?

Most fundamentally, the four-per-hour proposal is not an effective plan to reduce aircraft noise and congestion because

^{28/} See Notice of Proposed Rulemaking, Docket 19,948, pp. 11-12.

because it does not take enough jets out of the skies over Washington. FAA cannot seriously believe that this token change in slots -- which is neither four-per-hour, nor a reduction, when carefully analyzed -- can bring any meaningful noise relief to anyone.

Obviously, far greater cutbacks are needed so that there can be some meaningful noise relief, a cutback in the hazardous over-congestion of the WNA ATC, and a step toward a true rational balance in the use of the region's airports. The 50% cutback proposal makes sense, and will not unduly burden those coming to or from the close-in District areas, for whom WNA truly is more convenient.

The Lack of Definitive, Scheduled
Future Slot Rollbacks Serves The
Interest of No One

FAA has indicated that there may be future cutbacks in air carrier slots, with a projected goal of a reduction to 30 slots per hour by 1990. This is predicated, of course, on the introduction and utilization of wide-bodied aircraft, and the development of the now-anticipated mix of jet types over the next decade. Leaving this matter so uncertain, however, serves neither the public, which is clamoring for substantial cutbacks in WNA's use now, nor the airlines, which cannot be expected to

plan around such indecisiveness.

As members of the public have repeatedly urged, even FAA's optimistic projections of future rollbacks as wide-body aircraft are introduced will not bring significant noise relief in a reasonable period of time. The notion today, in 1980, that ten years from now there may be a 25% reduction in the number of planes in the air sounds to citizens like harsh medicine, indeed. The reduction is too small, and the time frame too long. Washington's citizenry should not be asked to endure another decade of WNA-generated jet noise at these intensive levels.

FAA's policy should be one which gives to the airlines a firm schedule around which to plan. The airlines cannot be expected to react to this proposal's vagueness by commencing the assiduous construction of new terminal facilities at IAD and BWI, staffing-up these facilities, and beginning the wholesale transfer of flights to those other airports. The airlines are left with the same wait-and-see scenario that confronts the public. The issue remains in today's state of limbo, thus assuring that the airline's "captive audience" ^{29/} approach -- maintaining virtually all operations out of WNA -- will be continued indefinitely.

^{29/} The degree to which there are simply no flight choices -- the notion that one flies from WNA or does not fly at all -- is readily apparent from the current Chicago-to-Washington schedule: of 33 flights each day from Chicago to Washington, 29 land at WNA; 4 land at BWI; and none -- not a single flight -- uses IAD. See Official Airline Guide, April 1, 1980, p. 1388.

By contrast, a fixed schedule of slot reductions would give the airlines something definitive to rely on and work with, phasing down their WNA operations and building up their presence at IAD and BWI, with flight transfers being effected as work progresses. It is simply unrealistic to expect the massive expenditures of funds by the airlines required for meaningful realignment of their Washington-area airport operations in the absence of a certain, defined slot rollback at WNA. A fixed rollback schedule will permit slot reductions at a reasonable pace -- commencing with six-per-hour in 1981, and an additional six slots phasing out in each of the following two years. Without a fixed rollback schedule, this will simply not happen.

FAA has also indicated the desire for some stability in the volatile Washington-area airports issue -- an issue which has seen complaints, politicking and litigation for a decade. To leave the subject of future rollbacks open is to invite the disruptions, uncertainties and hostilities that have visited this issue for ten years to continue ad infinitum. In short, the Washington metropolitan area, the airlines, and the travelling public have a right to know what is coming, and the opportunity to plan for it.

The 18,000,000 Passenger Limit Is A
Blatant Step in the Wrong Direction

FAA's policy would impose no further restraints on WNA growth until 18 million passengers per year squeeze through its outmoded facilities. This represents an 80% increase over the passenger levels of 1975, when WNA was already one of the most overcrowded airports in the United States; it represents nearly a 20% increase over today's intolerable levels. WNA must not be allowed to continue to grow.

The position of COG on this matter is an instructive example of what is now happening: while the policy questions of WNA's operation languish under consideration, year after year, the airport continues to grow like Topsy. In the interim, responsible governmental bodies -- like COG -- become increasingly frustrated as the problem inexorably grows worse. Thus, COG -- which had in 1978 talked of a ceiling which would permit FAA to maintain its then-current levels of passengers -- now, out of frustration, urges that FAA cut immediately back to the 14 million-passenger-per-year level. This evidences the increasing polarization -- even among responsible governmental agencies -- with the continued unwillingness by FAA to adopt and implement a WNA-policy that is rational and has backbone to it.

Can it be that COG, the Environmental Protection Agency, the Department of the Interior, every area jurisdiction, and

the thousands of concerned area citizens -- all of whom are expressing the common view that today's passenger levels at WNA are grossly too high -- are all out of step? CAP suggests that the 18,000,000 proposed limit will badly deteriorate an already critical situation -- overcrowded roads, overcrowded terminals, and most seriously, overcrowded skies -- at WNA. CAP urges FAA to put an immediate freeze on passenger growth at WNA, and to commence the orderly reduction of jet slots at the airport as quickly as possible.

The Wide-Bodied Myth: Why The
Wide-Bodies Are Not the Answer
To WNA's Problems

FAA's future slot rollbacks -- and its claimed benefits for its proposed policy -- are premised on the presence of wide-bodied aircraft at WNA in the near term, with increasing numbers of wide-bodies in use at WNA over the decade. The problem with this strategy is that the wide-bodied aircraft are simply not what FAA is cracking them up to be.

Noise. Fundamentally, the wide-bodied jets are not the silent, silver birds which FAA implies. Indeed, as the following figures make clear, wide-bodied jet aircraft are arguably louder than the conventional jet aircraft which presently utilize WNA. This surprising statistic appears from FAA's own DEIS:

30/

Take-Off Noise Levels

<u>Aircraft</u>	<u>Part 36 EPNdB Level</u>
B727-100	98.5 - 98.9
B727-200	98.9 - 100.4
B737-200	95.1 - 96.3
DC9-30	94.6 - 96.3
DC9-40	95.4 - 96.0
DC9-50	95.8 - 96.5

Thus, at their loudest, the present aircraft utilizing WNA peak at 100.4 EPNdB at take-off, while most of those jets are substantially quieter. By comparison, the wide-bodied aircraft show the following take-off EPNdB levels:

DC-10-10	104.7 - 105.8
DC-10-30	105.8 - 107.7
DC-10-40	105.6 - 107.9
L-1011	105.6
L-1011-1	105.0 - 105.6
Airbus	103.0 - 104.1

Of course, the wide-bodies are quieter than the old B-707's and DC-8's; but these aircraft do not now, and cannot in the future, use WNA. There is also some evidence in the DEIS that wide-bodies are actually quieter than older B-727 models, the foregoing tabular data notwithstanding. ^{31/}

Our point here is not to argue that wide-bodies are louder -- or quieter -- than current-generation aircraft which use WNA. Rather, it is our point that wide-bodies are

^{30/} All data taken from DEIS, Appendix 1. No figures for the BAC-111, a relatively noisy aircraft, were included.

^{31/} See, e.g., DEIS, Tables V-2 and V-3, pp. 62-63.

not a noise panacea; they can be an effective noise abatement tool only if they take aircraft out of the sky in greater numbers than they add -- a restriction (one-for-two) which FAA has not included in its proposed policy.

Groundside Accommodation. It has not been demonstrated to anyone's satisfaction that any wide-bodies can be accommodated at the overtaxed and outmoded WNA facilities. Major capital improvements at WNA to accommodate wide-bodies will be expensive, disruptive, and time-consuming, and given the size of the airport complex, it is not certain that they can be effected in any event. Certainly such major improvements will be deemed significant environmental action, requiring appropriate assessments and/or impact statements.

More fundamentally, FAA is contemplating a total of ^{32/} 25% of all WNA operations to utilize wide-bodies by 1990.

Where will these planes go? This will mean approximately 8 wide-bodied aircraft at WNA in any given hour. Since not a single such wide-body has proved that it can be accommodated at WNA as yet, should all future traffic reductions be predicated on this wholesale change in aircraft type?

Safety Considerations. Most compelling of the concerns over wide-bodies are those of safety. How will wide-bodies fit into WNA's highly congested traffic pattern, which now

^{32/} SDEIS, p. III-10.

often separate arriving aircraft by less than a minute? As FAA well knows, wide-bodies require several minutes' separation between aircraft in order to avoid severe turbulence from the wide-bodies vortex. If wide-bodies were introduced on a one-for-two basis, the reduction in operations which accommodate this air traffic control need. But under FAA's proposed policy, there is no such restriction. Does this mean that the distances between wide-bodies and following aircraft will be reduced? Is this consistent with safety?

There are also questions of runway length and the capability of WNA's runways to handle the severe gross weight of wide-bodied aircraft. CAP does not judge itself competent to address these issues -- nor, from a traffic control standpoint, the feasibility of reduced separation of arriving aircraft -- but CAP does believe these questions must be addressed, now, in FAA's proposed policy, for this reason: if the safety questions which CAP is raising cannot be adequately resolved, there is no basis to assume that wide-bodies will, in fact, create any of the additional slot reductions upon which FAA's entire proposed policy is premised.

In sum, the predication of all noise-abating benefits on wide-bodied aircraft seems optimistic at best and seriously questionable at worst. CAP believes, for reasons it has set forth, that there are better methods to use.

In sum, CAP does not oppose the introduction of wide-bodied aircraft at WNA if that introduction is accompanied by a restriction requiring the airlines to give up two narrow-bodied (or present-generation) operations in exchange for each such wide-body introduced. Such a restriction would dovetail with a fixed slot reduction, providing an appropriate mechanism for reducing the slots without unduly rapid loss in passenger levels. In this way, each airline which seeks to use wide-bodies could do so in a way which gives it optimum control over the impact of slot reductions on it.

In the absence of such restrictions, the pressure will remain for more flights and more passengers at WNA. And since that seems quite acceptable to FAA -- until a further 20% passenger level increase, to 18,000,000, is reached -- CAP must join the long line of commenters who oppose the unrestricted introduction of wide-bodies.

The "Short Haul" Sham: The 650-Mile Perimeter Rule Should Not Be Extended

WNA has traditionally been viewed by FAA as a "short haul" airport. In the 1978 DEIS, FAA proposed to retain that concept.^{33/} In the SDEIS, however, FAA concedes that WNA actually already serves as Washington's "short haul" and "medium haul" airport.^{34/}

^{33/} DEIS, p. 25.

^{34/} SDEIS, II-5.

In actuality, the "short haul" designation for WNA is totally inappropriate under current usage: under FAA's own definitions, a "short haul" airport limits stage lengths (i.e., nonstop origin or destination points) to 500 miles.^{35/}

At WNA, this stage-length perimeter has been set at 650 miles. The basis for this discrepancy is obvious: between 500 miles and 650 miles lie the following cities, among others: Chicago, Atlanta, Indianapolis, and Louisville. With the exception of New York, Chicago and Atlanta are the two most frequent origination points for WNA-bound flights

In the United States:	Total Flights	WNA	BWI	IAD
Washington/Chicago	30	26	4	0
Chicago/Washington	33	29	4	0
Washington/Atlanta	45	31	11	3
Atlanta/Washington	45	30	12	3

Thus, WNA handles 68% of the region's daily operations between Washington and Atlanta, and 83% of the region's daily operations between Washington and Chicago. IAD -- our "long haul" airport -- handles less than 7% of the Washington-Atlanta operations, and not a single flight to or from Chicago.^{36/} Moreover, the Chicago and Atlanta operations alone account for nearly 20% of the total daily operations at WNA.

^{35/} DEIS, p. 317.

^{36/} Source: Official Airline Guide, April 1, 1980.

Then, of course, there are the seven "grandfather" cities: Miami, Orlando, Tampa, West Palm Beach, St. Louis, Memphis and Minneapolis.^{37/} All of these cities lie beyond the 650-mile perimeter. They account in the aggregate for some 130 additional operations at WNA every day -- which account for 22% of the daily operations at WNA.^{38/}

When the 26 nonstop operations between WNA and Louisville, Nashville and Indianapolis are added, it is apparent that a total of nearly 46% of the nonstop flights into or out of WNA are to origin/destination points more than 500 miles from Washington. WNA is not now, and has not been, a "short haul" airport.

Despite the fact that these scheduling figures document the point that WNA is not now being used even as FAA intended, the proposed policy offers as an alternative the further extension of the 650-mile perimeter to 1,000 miles. This would bring such cities as Ft. Lauderdale, Kansas City, New Orleans, and Birmingham -- all located between 650 and 1,000 miles from Washington, into the perimeter, thus permitting nonstop service between WNA and those four cities. Presumably, it would also

^{37/} As FAA knows, these cities were "grandfathered" when the 650-mile perimeter rule was adopted because they had non-stop service to WNA, on propeller aircraft, prior to the rule's inception. No rational reason was given then, or has been offered since, why these flights could not have been transferred to IAD.

^{38/} It is interesting to note that all non-stop operations to and from Minneapolis -- nearly 1,000 miles from WNA -- use WNA; See Official Airline Guide, April 1, 1980, p. 1388.

eliminate the "inequity" of permitting such service to the seven grandfather cities while denying it to other cities equidistant from Washington.

CAP opposes this proposal. The addition of more cities with nonstop service to WNA can only result in more flights and more passengers -- and a further increase in the pressure to open WNA up still further. It is especially ironic that Kansas City would be added to this list, since Kansas City in recent years built its own new jetport -- far from town -- and now requires all flights from Washington to fly there.^{39/} The notion that nonstop service to WNA is necessary for nonstop service to Washington is simply nonsense. IAD and BWI are available to service these cities, and there is simply not a compelling reason to worsen the already-abused use of WNA as a medium and long-haul airport.

If fairness is the issue, the obvious answer is to remove the grandfather status from the seven cities which now enjoy it. The notion that these cities must simply use our "modern jetport" -- IAD -- is not onerous or burdensome to them, and merely compels the flying public from these cities

^{39/} The old Kansas City Airport was, like WNA, only two miles from downtown; all interstate flights now use the new Kansas City International which, like IAD, is 18 miles from the city. This is a familiar story -- familiar everywhere but Washington.

to do what we must do when flying to Kansas City, Chicago, or Dallas -- use the new jetport outside of town. Indeed, if the seven grandfather cities' operations were removed from WNA -- and not replaced by others -- WNA "slots" could be cut by 22%.

In sum, WNA is not the "short haul" airport that FAA claims it should be. Extensions of the perimeter can only exacerbate this situation. The 650-mile perimeter should be retained, and the grandfather status of the seven cities now exempt from the rule should be withdrawn.

CAP Supports the Proposed Curfew

FAA has retained from its DEIS policy proposal the concept of replacing the present voluntary scheduling curfew with a true, operational curfew which will have the force of law. CAP applauds this proposal, which is much-needed and an obvious and sensible limitation on the operation of an inner-city airport.

Since this does not represent a policy change from the 1978 DEIS, CAP will not dwell on this proposal. However, some of CAP's members have suggested to us that the 7:00 a.m. ban on airport operations (no flights prior to that time)

should be extended to 8:00 a.m. on weekends. This seems quite sensible, and will cause no disruptions to the business passenger who must catch early morning flights during the week. Other suggestions have come from CAP members who seek an early weekend cut-off time (eliminating evening flights on Saturday, for example, after 6:00 p.m.). CAP recognizes the logistical problem with arrivals from cities in different time zones, and does not formally advocate this position; the morning ban extension to 8:00 a.m. on weekends, however, seems totally reasonable.

In all other respects, CAP supports FAA's curfew proposal and notes that it is the only element of the proposed policy which has received near-universal support from Washington area residents, governments and representatives.

Conclusion: The Policy Is Misguided

CAP has shown that the proposed FAA policy will not achieve its objectives. CAP suggests that the policy is misguided because (i) by focusing on passenger limits rather than numbers of aircraft, the policy does not deal directly with the environmental problem; (ii) by permitting 18,000,000 passengers before attempting any constraints on WNA, the

policy would allow an already dangerous and unacceptable situation to worsen; (iii) by failing to propose fixed schedules of slot reductions, FAA perpetuates the uncertainty and turmoil which has plagued WNA for a years; (iv) by failing to propose really substantial cuts in WNA operations, FAA has doomed the Washington area to live with this unacceptable situation for another decade without meaningful relief.

Essentially, the FAA proposal fails because it is premised on future growth at WNA, rather than a reduction of that facility's use to some rational role in the area airport scheme. CAP believes that its proposals would better serve FAA's objectives. Before summarizing them, however, CAP wishes to address one other element of this issue: the oft-cited, alleged justifications for the continued maintenance of WNA as Washington's primary jetport.

Debunking the Bugaboos: The Alleged
Justifications For The Continued Overuse
of WNA Cannot Be Substantiated

CAP has listened carefully to the arguments proffered in support of the current operation of WNA. Because FAA's proposed policy would perpetuate that use in its most critical respect -- the continued reliance on WNA as Washington's primary

jetport -- these arguments need to be addressed.

"National Airport Is So Convenient". The most often-mentioned justification for the continued overreliance on WNA is the view that the airport is so convenient -- and that IAD and BWI are so inconvenient -- that they really present no reasonable alternative. Everyone uses WNA, the argument goes, because it is so convenient; if people wanted -- or were willing -- to use IAD and BWI, they would.

To the extent that this argument had substance in 1962 when IAD was built far outside the mainstream of the Washington metropolitan area, it is simply not true today. No one, including CAP, can deny that WNA is more convenient for some close-in residents who seek to fly out of Washington. Similarly, WNA is obviously more convenient for many who come from out of town to attend Capitol Hill or downtown meetings. It is only because WNA is convenient for these two classes of people that CAP does not openly advocate closing the airport altogether.

Since 1962, however, there have been enormous changes in the residential and work patterns of Washington area residents. While the Beltway once defined the outer perimeter of the Washington metropolitan area, it is today an internal highway, with some two-thirds of the area's residents living beyond I-495. For these people, WNA is not more convenient.

On the contrary, because one must essentially commute to downtown -- in rush-hour traffic, if a morning or evening flight is involved -- the travel time to WNA is longer for a great number of Washington area residents than would be comparable travel to IAD or BWI. It is unfortunate that no formal studies of this phenomenon have been made by FAA or, apparently, the airlines: any Montgomery County resident living outside the Beltway, and many who live near or inside it as well, can attest to this fact; it is no less true for thousands of Fairfax County residents; and many Prince George's County residents find the same thing to be true with respect to BWI.

As to work patterns, the conventional wisdom of IAD's inconvenience totally ignores the huge expanse of business development outside of Washington, D.C. The I-270 corridor, which contained cow pastures when IAD was built in 1962, now houses dozens of major corporations; Tyson's Corner in Virginia has experienced similar growth; and of course the Dulles Corridor itself is experiencing such growth and development constantly. For most of these localities -- and the people who work there or must visit there on business -- IAD is more convenient, not less.

Why, then, do more people not use IAD? The answer, quite simply, is that there are no flights to choose from at IAD. We have already shown that one literally cannot fly nonstop to Chicago at all from IAD;^{46/} that only six of the 90 daily operations between Washington and Atlanta use IAD; of some 68 daily flights to New York (exclusive of extra-sections of Eastern's Air-Shuttle), only nine leave from IAD, and none of those leaves before 10:00 a.m.,^{47/} and five leave after 8:40 p.m. Of 28 daily flights to the Washington area from Boston, only one, at 3:30 p.m., flies to IAD. Other truly "short haul" cities, like Buffalo, Pittsburgh, Cincinnati, Cleveland, Detroit, and Charlotte, have no service to or from IAD whatsoever.^{48/} Indeed, much of the "long haul" service is only available from WNA.

WNA offers

- the only one-plane service from Little Rock;
- the only one-plane service from Albuquerque;
- the only one-plane service from Bismark;

^{46/} See p. 38, *supra*.

^{47/} *Official Airline Guide*, April 1, 1980, p.938.

^{48/} *Id.*

- the only one-plane service from Daytona Beach;
- the only one-plane service from Des Moines;
- the only one-plane service to Jackson, Mississippi;
- the only one-plane service to Milwaukee;
- the only one-plane service to Omaha;
- the only one-plane service to Portland, Oregon; ^{49/}
- the only one-plane service to Sacramento;
- the only one-plane service to Shreveport;
- the only one-plane service to Spokane, Washington;
- the only one-plane service to Toronto, Canada;
- the only one-plane service to Tucson, Arizona;

More than half of the one-plane service to Dallas and Kansas City use WNA; ^{50/} nearly half of the one-plane service between Washington and Houston uses WNA. ^{51/} And one can fly into WNA without changing planes from Los Angeles, San Francisco, Denver, New Orleans, Las Vegas, Salt Lake City, and Seattle -- all with just a single stop.

In sum, the old saw that IAD is too inconvenient is simply untrue. The airlines do not schedule operations out of

^{49/} A morning flight from IAD is scheduled to commence in June, 1980.

^{50/} Dallas' close-in airport, Love Field, is not open to traffic from Washington; Kansas City's close-in Kansas City Airport, is not open to traffic from Washington. Those cities require out-of-state passengers to use their modern jetports outside of town.

^{51/} Houston, too, does not allow Washington traffic into Hobby Field. Traffic must instead use Houston International, a modern jetport outside of town.

IAD -- there are fewer commercial jet flights at IAD than there were ten years ago.^{22/} The plain fact is that the airlines have a captive audience at WNA; it is obviously less expensive for them to operate with only one major plant in Washington, rather than three. Even FAA has recognized in its SDEIS that the "highly competitive forces within the airline industry" have contributed to the overuse of WNA.^{23/} No airline will voluntarily commit the resources to build, staff and maintain facilities at three airports, when it can enhance profits by maintaining only a token presence at two. If there were flights at IAD, people would use them; if there were substantial numbers of flights; connecting flights would use IAD; if there were more flights, ground transportation would improve at IAD. IAD is not inconvenient; it is underserved, and there has been no FAA policy to change this misalignment of jet traffic in our region since IAD opened in 1962.

"National is a 'National' Airport". Another favored expression which is used to justify the serious overuse of WNA is the puzzling notion that WNA is a "national" airport, and thus is a "national resource". The argument -- which is advanced

^{22/} In 1968, there were 58,876 commercial air carrier operations at IAD; in 1977, that number had decreased to 55,876. Total aircraft operations during that ten-year period decreased from a peak of 224,295 in 1969 to only 186,391 in 1977. See DEIS, Table IV-3, p. 44.

^{23/} SDEIS, p. II-9.

by several cities around the country which would like service to WNA -- is that this close-in facility should be made open and available to fly into from all American cities.

Would it be sensible to argue that there should be no parking regulations in the District of Columbia so that our out-of-town visitors could have the convenience of parking as close to our museums and national monuments as they would like? Should anyone have the right of access to the White House whenever he pleased, on an unrestricted basis, simply because it is a "National" treasure? The notion that WNA is a "national resource" is nonsense. WNA is an antiquated airport which ceased, years ago, adequately to accommodate millions of Americans who sought to come to Washington, a city which is filled with true "national" treasures and "national" resources. The idea that WNA should not be governed by rational restrictions, which are needed for safety and environmental considerations, is simply too absurd to require prolonged discussion.

The "national resource" argument is especially ironic, however, in view of the incredible degradation to our true "national" treasures -- the Lincoln and Jefferson Memorials and the federal area in general -- which is generated by WNA. As noted above, the noise pollution from WNA is intolerable in

these areas, seriously undermining the ability of Americans to enjoy their nation's capital. More fundamentally, our national monuments are themselves deteriorating from jet pollution.^{54/} The National Park Service has openly opposed the present use of WNA.^{55/}

Finally, when we think in terms of "national" treasures, could Washington possibly place a better foot forward than by inviting its visitors to be received at IAD, one of the most beautifully-designed airports in the world? The notion that WNA is a "national" resource is simply ludicrous, and it is entitled to no consideration in developing a rational airports policy.

A final point about the "national" nature of WNA: we must not forget that when the citizens of Chicago, Kansas City, Dallas, and Houston clamor for the convenience of WNA, we must remind them -- and ourselves -- that all of those cities require that visitors to those communities use their modern jetports, all of which are located at least as far from their downtown areas as is IAD.

^{54/} See p. 19, *supra*.

^{55/} *Id.*, at footnote 15.

"Closing National Would Be an Economic Disaster". This argument is frequently heard to suggest that restrictions on WNA operations will bring economic havoc to the area. WNA is the fourth-largest employer in the area, it is argued, and if FAA acquiesces in "citizen demands", many jobs will be lost. Like the other arguments which support the present overuse of WNA, this one is baseless.

First, it must be noted that neither COG nor CAP has suggested that WNA be closed. All reasonable policy arguments urge a cutback in the use of WNA, leaving it with approximately one-third of the region's jet traffic. So the frequent references to "closing" WNA overstate the premise.

More fundamentally, the argument has basis neither in logic nor in FAA's own projections: the reduction in operations at WNA may result in the transfer of some jobs from WNA to IAD; it is wholly illogical to assume that there would be losses of jobs, but rather a slight increase in jobs because the balancing of the three airports would result in duplication of services to a greater extent than exists now. And FAA's figures confirm this point:

	WNA Jobs	IAD Jobs	BWI Jobs	Total Jobs
Restrained Growth Alternative	5,060	4,530	5,200	14,790
Expanded Growth Alternative	5,770	3,920	4,450	14,140
FAA Proposed Policy	5,300	4,890	4,950	15,140
No Policy Change	5,500	4,150	4,700	14,350

SDEIS, Exhibit V-13.

These figures confirm that, irrespective of the policy mix, the number of jobs furnished by the region's airports will be about the same, with slightly more jobs available than more than WNA is restricted in use.

In addition, FAA figures show that total "economic impacts" of the various policy alternatives also remain constant, documenting the notion that while some jobs may be transferred, virtually none would be lost:

	<u>No Policy Change</u>	<u>Expanded Growth</u>	<u>Restricted Growth</u>
Total Dollar Impacts	\$362,300,000.00	361,900,000.00	367,800,000.00

SDEIS, Table V-14.

Finally, it is worthy of note that while the economic relationship between WNA and its neighboring local jurisdictions may confer certain economic benefits, it is clearly a two-edged sword, with problems of adequate local ability to tax.^{56/}

In short, the economic disaster argument is specious, unnecessarily impeding rational airport planning. No drastic economic consequences will occur if WNA's fundamental role is changed; some jobs may be transferred, but the overall economic impact will not be substantial.

^{56/} See "The Role of Government in Airport Planning", by Jerry K. Emrich, Arlington County Attorney, in Washington National Airport Through The Eighties, Federal Bar Association panel, October 19-20, 1978.

"Congress Will Never Allow It". This is the final oft-repeated cliché offered as the justification for doing nothing about the overuse of WNA. And it is the most difficult to deal with, since it is so hard to prove a negative: CAP cannot demonstrate that Congress will stand aside while FAA develops a rational airport policy; only an effort by FAA to do so will provide that proof.

The fact is, however, that no heads have rolled as a result of the basic policy concepts already advanced by FAA; the notion that WNA's role as Washington's major airport should end has not brought storms of protest from The Hill. To the contrary, the notion that WNA must be substantially cut back in operations is gaining wider and wider acceptance: other Federal agencies -- EPA and the Department of Interior, for example -- support the reduced role for WNA; another Federal agency, the National Capital Planning Commission, has now called for the complete closure of WNA by 1990; and FAA has conceded that all regional governments (directly and through COG) are firmly in favor of a 50% reduction in WNA's use by commercial jets.

Will Congress "stand for" a real cutback at WNA? In 1978, the FAA's proposed policy for WNA brought responses from a total of 72 members of Congress -- less than 14%

of The Hill's membership.^{37/} Six of those opposed FAA's policy proposal because it was not restrictive enough. Since the 1980 proposal has been publicized, CAP is aware of no strong Hill efforts to preclude a more rational policy choice through the FAA's rulemaking process. We know only of the comment of Senator John Glenn, who was concerned only with the arrival curfew as it would affect him personally.

The fact is that WNA is not now used by all Congressmen, and there are alternatives for flights to IAD: one proposal, for example, would develop helicopter service from Union Station to IAD, making IAD virtually as convenient from the Hill as WNA. More fundamentally, the reduction in use of WNA does not mean an end to convenient WNA flights: is it really necessary to have 34 out of 66 Washington/Chicago daily operations use WNA, with not a single flight from IAD? Is it unthinkable that if there were only 15 flights a day to Chicago from WNA instead of 29, that Congressmen would be unduly hindered?

From the oral testimony received by FAA on March 20, 23 and 27, 1980, it is obvious that FAA would be wholly justified in rethinking its proposal and coming up with a far more restricted use of WNA in its final policy statement. CAP can only conclude that this argument is the real bogeyman of airport planning progress in our region: there is no proof

^{37/} See SDEIS, II-11.

that such Congressional interference would, in fact, be forthcoming; instead, the threat of it is casting a false shadow over FAA, which, for the first time in many years, is in a position to take a positive, meaningful step toward resolving the longstanding WNA issue.

III. The CAP Proposal Offer A More Effective Alternative for Rational Airport Planning

The essence of CAP's position on most aspects of WNA policy has already emerged from these comments. CAP will therefore only briefly summarize these positions in this section.

An Immediate Freeze on WNA Growth Is Essential To Avoid Compounding The WNA Problem

The number of aircraft passengers at WNA has explosively grown since 1975. Between 1969 and 1974, WNA passenger growth increased only modestly, from 10,247,537 to 11,706,028 (14% increase in five years).^{58/} Since then, however, the growth has been staggering: in the following five years, WNA passenger levels have increased to 15,500,000.

^{58/} The Future of Washington's Airports, December, 1975, p. 42.

an increase of nearly 33%. This growth must not be allowed to continue because to do so will only exacerbate an already dangerous and unacceptable condition at WNA.

A freeze on passenger levels now will provide a signal to the airline industry that a new policy is, in fact, taking place at WNA. It will preclude -- on a nondiscriminatory basis -- the introduction of new airline service to WNA.^{59/} Slots which are abandoned now, for fuel consideration or otherwise, should remain open pending issuance of a final policy.

The 50% Slot Reduction Is the
Only Meaningful Solution to the
WNA Problem

Much has been said in these comments about the 50% slot reduction proposal, and it will not be repeated here. Suffice it to say that this is the only effective tool with which to attack the problem of severe overuse of WNA. The problem, at bottom, is numbers of jet aircraft. Focusing on passenger levels, wide-bodied and new generation aircraft, or operational techniques necessarily attacks the problem on the periphery.

^{59/} In the past year, several new services, such as those offered by Air Florida and Western Air Lines, have been added to WNA. CAP recognizes that there are complicated allocation problems in determining who will get WNA's slots. Our suggestion here is only that abandoned slots be frozen pending issuance of a final policy.

We have described the benefits of a fixed, phased-in schedule of slot reductions: the certainty around which the airlines can plan; the avoidance of interminable political fights in the future over how many slot cuts, and where and when they should occur; and the prospect, for Washington area citizens, that concrete steps finally are being taken to deal with the WNA problem. Slot reductions of less than 50% are going to be ineffectual: they will bring no meaningful noise relief, and they will not be of a magnitude which will compel constructive reaction by the airline industry.

The effectuation of a 50% slot reduction will produce no hardships for anyone who does benefit from the close-in location of WNA; there will still be ample numbers of flights to major cities, since the airlines will be certain to fill their slots consistent with marketplace demands. At the same time, alternative schedules from IAD and BWI will be developed, which will benefit many Washington area residents and, at the minimum, be acceptable to thousands of others.

In short, CAF has simply not heard an argument against the 50% slot reduction which makes sense to us. We believe that it is the essential cornerstone of any Washington airports policy.

The Curfew Is Essential -- But It Is
Only a Partial Answer to the WNA Problem

We have already stated our support for FAA's curfew proposal, with modest modifications. We wish to reiterate it here only to underscore its importance. The curfew proposal addresses a real and vexing problem: the unending intrusion of late evening and night operations at WNA. We wholeheartedly endorse it.

At the same time, CAP would caution that this should not be seen as a substitute for the slot reduction requested by CAP, COG and hundreds of others: it is wrong to assume that the "real" problem is the night flights; that is only one problem, and it is essential that we address the problem for the 15 hours per day that the airport will be open. This is especially true for housewives, children, the retired, the elderly, and the ill, all of whom are whom throughout the day and must live with the noise nightmare of WNA. The curfew is fine, but it is only part of the solution.

Mandatory Noise Abatement Techniques:
Is A Stone Being Left Unturned?

CAP has heard much in recent years about the "Northwest Orient Take-off Procedures", the "ATA Climb" and higher glide-slope descents. CAP is not in a position to evaluate the

noise abatement merits of some of these operational techniques. However, it appears clear that the WNA take-off procedures are at least somewhat out of step with procedures used elsewhere around the country. The climb to 1,500 feet at full thrust, followed by a levelling-off to a reduced climb setting to 10 miles DME, may not in fact be the most beneficial noise abatement climb mode. CAP recognizes that reduced power at one locality may mean increased noise at another, and asks only that FAA take another look at its operational techniques and incorporate into them the benefits which may be available from other aviation expert sources.

In this regard, CAP makes two policy requests: first, that whatever optimal take-off and landing techniques are deemed desirable, they should be made mandatory; and second, the re-application of full power thrust should be deferred to a point at least 15 miles DME. No matter what flight path is used, aircraft departing WNA necessarily find themselves over highly populated areas at 10 miles DME. While CAP favors a change in the present flight path configuration, it also urges that power not be reapplied until 15 miles, when there is more separation between aircraft and ground. Moreover, this, too, must be mandatory; too often, power is reapplied prematurely and unnecessarily burdens citizens below with additional noise.

There Is an Ongoing Need For a Citizens
Advisory Board to Maintain Dialogue
And Discussion About WNA Policy

On June 14, 1978, COG passed a resolution which called for, inter alia, a major cutback in the use of WNA by commercial jet operations. COG also stated in that resolution that

The Council is distressed that the local governments of this region continue to have no direct vote and very little impact on the operations of National and Dulles airports, a situation which does not exist at any other major air carrier airport in the Nation.

COG went on in this Resolution to call for a Citizens Advisory Board which would rectify this situation:

The Council strongly supports recent Congressional efforts to create a Regional Aviation Advisory Board as a continuing forum for addressing aviation policy issues facing the Washington area, provided, however, that the FAA as airport proprietor, is committed to abiding by policies formulated by such a mechanism in the absence of clearly stated reasons involving safety or legal constraints.

See COG Resolution R25-78, June 14, 1978.

FAA's past reluctance to permit such a Board has been ostensibly premised on FAA's understanding of the legal constraints against affording such a Board any degree of actual authority in airport policymaking. It is CAP's view that this question should not be permitted to deter the creation of an FAA-sponsored Citizens' Advisory Board on

Washington Airports Policy.

The question of Board authority is an important matter, but clearly should not be an impediment to the creation of such an organization at all. CAP has learned, even through its own recent experience, that cooperation among citizens can result in a more informed public and, hopefully, can assist FAA in developing answers to future airport policy questions the consequences of which we all must share.

CAP would suggest that FAA establish such a Board, with membership consisting of COG, National Capital Region Transportation Planning Board, CAP (and other citizens' groups, if appropriate), and FAA representation. ^{60/} In addition to current questions of airport policy, others will undoubtedly confront our region over the next few years. For example:

- if commercial jet traffic is reduced at WNA, to what extent should general aviation and/or commuter aviation replace it?
- what means should be developed to improve access to IAD?
- what improvements should be made to WNA facilities?
- should WNA flight paths be changed?
- should there be incentives -- such as "noise taxes" -- to encourage the transfer of flights to IAD?

^{60/} CAP would encourage broad, rather than narrow, membership: ATA, AOFA, ALPA, and the Airline Passengers Association would add diverse and expert voices to such a Board.

In sum, CAP does not seek to argue the legality of transferring any actual control authority over to such a Board at this juncture. Rather, CAP asks FAA to undertake the critical first step of establishing such a Board, and permitting it to have a voice in airport policymaking. If this initial action is effected in good faith -- even in a purely advisory context -- cooperation and more informed discussion of airport issues will necessarily result.

Wide-Bodies At WNA Must Be
Introduced Only on a Restricted
Basis

We have adequately discussed this problem already. We repeat here only our conviction that wide-bodies are not inherent noise-shatters; we recognize the desirability of more efficient aircraft operation, and do not seek unnecessarily to impede their introduction to WNA. However, wide-bodies still bring noise, additional traffic congestion, pressure for more passengers, and questions of air safety. We believe these negative factors can be obviated only through a one-for-two restriction, replacing two current-generation jets with each wide-bodied aircraft. No other introduction of wide-bodied aircraft insures that they will not become a mere steppingstone to further problems at WNA.

Better Access to IAD Is Essential

The decade-long delay in the development of Dulles has brought with it some very discouraging signs, wholly apart from the continued environmental burdens of WNA. Specifically, short-sighted planning is slowly eroding the very benefits that IAD was designed to inhibit: recently, FAA opened the Dulles Access Road to commuter traffic; Fairfax County is now permitting housing construction directly under the IAD flight paths. These are signs of the long-absent need for a comprehensive airports plan. Another is the failure to develop adequate, improved access to IAD.

Obviously, the long-term solution for access to IAD is the high-speed rail link that we all envision heading down the Access Road median strip. CAP is not unaware of the budgetary problems of Metrorail, and the current federal emphasis on reduced spending. Nonetheless, FAA is now contemplating the expenditure of millions of dollars for capital improvements at WNA. CAP submits that these funds could be better spent on IAD access.

In the short run, we seek direct linkup with I-66, and vastly improved bus service, as immediate needs. A tie in to the Metro system at Vienna is an obvious goal. Parking facilities at IAD need to be further improved (the new short term lot is a decided improvement). We are aware of baggage

and gate-area expansion now underway.

The improvement of access to IAD is a difficult problem but it is one which must be addressed by FAA in its final policy statement. This will not only chart a course for such improvements, but it will also discourage the encroachments upon IAD -- and its excellent land-use planning -- which are creeping into the IAD picture. A comprehensive plan must, therefore, consider IAD access, and it must do so at the first possible opportunity.

Retain the 650-Mile Limit And
Remove the Grandfather Status
of the Seven Cities

We have explained above our reasons for opposing the extension of the 650-mile limit, and they essentially distill down to one key point: CAP opposes anything which puts increased pressure on WNA for more flights or more passengers, and adding further nonstop service there is bound to do just that. CAP does not otherwise care where planes fly; it simply wants ^{61/} fewer of them.

The elimination of grandfather status to the seven cities which now enjoy it would strike a blow for fairness and even-handedness, and at the same time take a significant step toward the reduction of WNA slots. As noted above, they

^{61/} It is true, of course, that a plane bound for a farther destination is heavier due to extra fuel, and will thus be lower -- and hence louder -- than the same aircraft with a shorter destination.

presently account for some 22% of WNA's daily operations. By eliminating these flights -- and the slots which go with them -- FAA could create virtually as much reduction in numbers of flights as it hopes to effect by 1990 under its proposed policy.

The Need for Equitable Flight Paths
Is Crucial To Bring Some Relief to
Noise-Weary Area Citizens

As these comments are being written, a proposal is before FAA -- based on a COG resolution now only a few days' old -- which would for the first time seek out the testing of more equitable flight paths at WNA. CAP's position on this matter is appended to the COG resolution which has been submitted to FAA for study.

Essentially, the problem here is that for more than a decade, one group of Washington area citizens has been asked to shoulder the entire noise burden of WNA. The "preferential" flight paths, up and down the Potomac River corridor, dump all noise and air pollution on these same people, hundreds of times each day. This is unfair, and it is not done at any other airport in the United States of which CAP is aware.

As CAP has made clear in the proceeding before COG (and now before FAA for consideration), flight paths at WNA should

be as equitable as possible. This means that the flights should be fanned out over the broadest possible geographic area, with the most even and uniform distribution of aircraft in that area, as can be effected, consistent with safety.

CAP recognizes that there is prohibited airspace in the District of Columbia which impedes the participation of the District in such flight path scattering. However, CAP has made overtures to the Executive Office of the President -- and CAP seeks FAA's help here -- to attempt a reduction or elimination in the P-56 and P-71 areas, so that affected District residents may also benefit from this type of flight path change.

The flight path issue, perhaps more than any other, demonstrates the value of such bodies as a Citizens Advisory Board. When this subject was raised by FAA in 1977, there was mass public confusion, mass hysteria, and public fear. Every jurisdiction -- except Montgomery County, Maryland -- voted against such a "scatter" pattern. Today, with CAP helping to explain to citizens' groups and their elected representatives what this type of flight path really portends, the attitudes are changing: CAP submits that cooperation between FAA and the citizenry can help establish mutual understanding and respect, which has been sorely lacking in the past. On this

issue, for example, we may be able to develop a flight path which will bring noise relief to thousands of area citizens, avoid imposing an undue noise burden on anyone else, and permit the airlines to save hundreds of thousands of gallons of fuel in the process.

CAP does not believe that flight paths are a solution to WNA problems in and of themselves. They are one facet of the overall issue, a facet which has been ignored for too long.

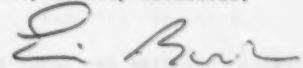
IV. Conclusion: The Time Has Come For A Real Change in the Operation of The Washington Area Airports

Events have moved quickly in the last year: more and more citizens, representatives, government agencies, and area media have come down squarely on the side of a reduced role for WNA -- a far smaller role in our region's airport system than is contemplated by FAA's proposal.

CAP asks FAA to reconsider in good faith the thrust of its proposal, to examine with care the arguments advanced in favor of it, and the positions expressed by the hundreds of commenters who contend that a 50% reduction in the number of air carrier operations at WNA is the only realistic and rational policy position which can be taken. We believe that

a good-faith analysis of this complex issue does compel this conclusion. The gross overutilization of National Airport must come to an end. All parties are better served if this end is reached through reasoned policymaking, rather than through politics, litigation, or at worst, through the unyielding logic of disaster. We pledge to work with FAA toward the effective implementation of such a policy, and we stand ready to support FAA in its efforts to bring this policy about.

Respectfully submitted,



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April 13, 1980

Mr. BERNTHAL. Fine. You will find there the entire citizen viewpoint expressed in one place. For today I would just like to stress these two points.

First, there must be a phased in, 50-percent reduction in commercial jet slots at National. This will compel an orderly transfer of flights from National to Dulles and BWI. The airlines may not like having to give up the captive market they now have which compels virtually all Washington travelers to pass through National. But we have no right to expect reasonable policymaking from the airlines, on their own. As former FAA Director Quesada testified 11 years ago:

We just have to find some way of bringing a reasonable and logical restraint on the uninhibited use of National Airport. I assure you that this cannot be accomplished by agreement with the airlines.

And I implore this committee not to be fooled by the fears that reduction in National's slots will translate into loss of service to and from your communities. That may happen as a result of deregulation, or rising fuel costs, but the question of whether there is service to Washington is quite separate from the question of where that service lands in Washington.

Second, Dulles and National must be transferred to an autonomous regional authority similar to Port Authority in New York. After all these years, the one thing that is certain is that the Federal Government should get out of the airport business. Indeed, in the past 3 months we have had lengthy meetings with the FAA Administrator, Mr. Bond, the Secretary of Transportation of the United States, a high-ranking member of the White House staff, and we now testify before this congressional committee. It is sad and absurd that the highest levels of the Federal Government must turn their attention from more important tasks to formulate operational policies for Washington's airports.

Mr. Mineta earlier today I think characterized this as sitting in on the city council meeting.

We have heard every imaginable justification for the present overuse of National Airport—"National is so convenient"; "National is a 'national' airport"; "National is essential for Washington's business community." We suggest to you that none of these arguments will stand up to fairminded scrutiny or logic. When the residents of Chicago, Kansas City, Dallas, and Houston argue to you that they have some inalienable right to fly into National, ask them why we fly to O'Hare, Kansas City International, DFW, or Houston International when we visit their cities; when the airlines tell you that they are only responding to the marketplace and providing service from National because that is what the public wants, ask them how the public can choose when there is only 1 flight out of 66 operations a day between Washington and Chicago which uses Dulles, and not a single flight from Dulles to Buffalo, Detroit, Pittsburgh, Cincinnati, Cleveland, Charlotte, Little Rock, Albuquerque, Jackson, Portland, Milwaukee, Omaha, Sacramento, Toronto, Spokane, Shreveport, or Tucson. And that is based on my fast research. There may be some others. Convenience? Mr. Chairman, there is no alternative. You have got to use National.

There remains only one final argument, and that one requires neither logic nor openmindedness: "Congress won't have it any other way." Proving that old saw wrong is up to you.

I am sorry, I know I have gone over my time here, but we do have the views of an awful lot of citizens to present. I am sorry that many of the members of the committee are not here now, because they raised quite a few points this morning which I would like to respond to if I may, with your permission.

The first was reference to the high-density rule in 1969. This is the rule that limits it to 60 operations per hour.

There was an implication in the testimony of several people and in some of the comments that this was somehow environmentally related. It was safety considerations that created this rule. You just can't jam any more airplanes into National than that and that is why the rule was put into effect.

A question was raised by the committee about the night curfew and whether that might not be an adequate alternative. Maybe that would be enough relief. Of course, we prefer the night curfew and the late night flights are a problem.

Does this solve the problem entirely? How could it possibly? The airport remains open 15 hours a day, and isn't it a little arrogant for us to say that we are going to cut back service on weekends and at night and leave the incredible 20 overflights an hour, depending on whether you are north or south of the airport, 20 overflights an hour over housewives, children, the elderly, the ill, people who happen to be at home all day?

It is a little bit arrogant.

The argument that National is a national airport is one I just frankly never understood. I don't understand who in the Nation enjoys sitting 30 to 45 minutes on the National runway waiting to depart or waiting to land. I don't understand how it is in the Nation's interest that the Jefferson Memorial and the Washington Monument fall apart.

What we are calling for is simply a balance among the airports. A 50-percent reduction in slots will create a balance among the 3 regional airports.

There was a question raised by Congressman Snyder. It was about the scatter pattern and whether that is not a possible alternative. It is correct that 3 years ago, such an alternative was proposed in a fashion in which essentially the following question was asked: Who would like to take the airplanes from National Airport off those poor folks who live in the Potomac corridor? The result was not surprising. Not very many people volunteered. However, for 3 years we have been working on the scatter problem.

Indeed, the Metropolitan Washington Council of Governments took a vote just 2 months ago to ask FAA to study a scatter plan for north and south of the airport. They are working on that right now, and I would like to mention one little problem we have run into.

In order to have a true scatter pattern based on the idea of uniform distribution of flights over the widest possible geographic area, you need to include the entire District of Columbia to participate in it, but there is restricted air space stretching from the Lincoln Memorial all the way over to the Capitol, and I thought it

was rather ironic that Congressman Snyder was implying that that was a good solution.

We think it is a good idea, too, and one of the reasons why we are having trouble getting it done is the Sergeant of Arms at the Capitol said, "We don't want any planes flying over here." We are living with no flights over the FAA headquarters on Independence Avenue, no flights over the Secretary of Transportation's office, and no flights over the Capitol, but 300 a day in the Potomac River corridor.

We favor the scatter, and we would like some cooperation in getting it implemented.

He also implied that maybe the problem isn't so bad, again referring to Congressman Snyder. He said: "Maybe the problem isn't so bad. Look how those property values went up."

I commend to him a reading of a study done by the Potomac Valley League, an association of 27 citizen groups throughout the metropolitan area.

They found that 82 percent of the residents surveyed in the Potomac River corridor area named aircraft noise as the single biggest problem in their community, and I would like to ask any of you when 82 percent of the people agreed on anything.

Just a couple more points, if I may.

Mr. Goldwater raised the question, well, if it is so bad at National now won't it be just as bad at Dulles if you transfer all those flights out there?

That ignores the very basic advantage to transferring the flights to Dulles, and that is that you are going against the commuting patterns to downtown Washington. Right now anybody who wants to catch a morning or evening flight to National has to fight with the commuters for space on the parkways, and that is why we have bumper-to-bumper traffic.

Dulles is in the opposite direction of Washington, D. C. and that is why the impact wouldn't be as great.

You also mentioned an economic impact and whether or not that wouldn't be severe. The FAA's own figures prove that not to be the case. There will be negligible economic impact if their policy is implemented, and it makes sense.

It is merely spreading the flights out among three airports. There will be some duplication of jobs and, if anything, the economic impact ought to be better for our area rather than worse.

One last point here about the noise contour maps which Mr. Mineta referred to. Be very careful before you rely on any noise contour maps found in any FAA draft environmental impact statement.

It would take too long to explain to you how deceptive those maps are, but in our comments here we have laid it all out and if anyone is interested in looking, we will be glad to have them see this.

It all has to do with the magic minute all of those flights that are scheduled late at night. FAA in 1978 came up with a noise contour map that said a 30-percent increase in the operations at National would result in a decrease in noise.

Finally, Mrs. Bouquard said she was so sensitive to safety.

I find it really just hard to understand how anyone who cares about safety can ignore the fact that National Airport was built to handle DC-3's and has 6,800-foot runways. There is only one main jet runway.

We understand it is the busiest single jet runway in the United States, and I would like to share with you the comment of a former head of the National Transportation Safety Board who was asked the question at a panel: "Is National Airport safe or isn't it?"

He said, "Oh, yes, it is quite safe. You see, the margin for error at National is so small that those pilots are really on their toes when they are coming in there. It is quite safe."

I don't know how much comfort that gives you. It didn't give me much.

The last point I will make, and I again apologize for going over my time.

Mr. Philion from the Air Transport Association threw some horrible numbers at you about 100 flights a day that would be canceled. They wouldn't have to be cancelled. They would only have to be transferred. Those flights can still come into Washington. They only have to land at an airport which is a little bit further away from Washington, and which is for a lot of people a heck of a lot more convenient.

Thank you, and I am sorry that I overused my time here.

Mr. ANDERSON. Thank you, Mr. Bernthal.

Mr. Williams?

Mr. WILLIAMS. Thank you, Mr. Chairman.

I speak for the Committee for Dulles, a volunteer group of individuals and businesses.

I bring perhaps a little different perspective to this hearing, because for 10 years I was a member of the General Assembly of Virginia representing Fairfax County and the cities in that area, and the emphasis which I had to bring to my legislative service was in the field of transportation and taxation, so I have appreciation of the demand of constituents, both in terms of money and in terms of convenience.

I sympathize in what you have to do in dealing with this problem. The points about safety and noise and so forth have been emphasized so much that I would like to come down harder, if I may, on the economics of it.

The policy of building up National Airport, as it has continued over the years, first 4 million passengers a year, 6, 8, 10, 12, and now it is up to 15 million, and the FAA proposes 18, goes counter to what is really happening in the National Capital area.

In northern Virginia alone, as of 2 years ago, over 30 percent of the population was closer to Dulles than to National.

That has nothing to do with the population in Montgomery County, Md., and areas in Maryland adjacent to it which would also be much better served by Dulles than by National.

The economic growth, not simply the population growth that is taking place in Fairfax County, Va., and to a lesser extent in Loudoun and Prince William Counties, but almost as phenomenal in Montgomery County, Md., indicates that the policy of putting more passengers, 1 million a year at National, just does not make sense.

In the Tysons Corner area of Fairfax County alone, probably the highest and fastest growing area in the country, so projected, there have been 15,000 new jobs, and in that little area alone right at Tysons Corner, 15,000 new jobs alone in the last 4 to 5 years, and they project another 25,000 in the next 5 years.

By 1982 there will be 10 million square feet of office space in that area alone. A lot of this is research and development, that type of industry and growth to which travel is an essential function. And for Montgomery County with the development out which is phenomenal and that of Fairfax County, this FAA policy does not go far enough.

The second point I would like to make to you is that if the Government is going to make a deregulation policy then they ought to treat both airports equally. They own both of them. If they want to get rid of them, OK, but if they are going to hold onto them, let them treat them equally.

I say that Dulles is the stepchild and National is the fair-haired baby. There is no question whatever about that.

The policy of the Government frankly has been what I call a Scarlet O'Hara policy, "I won't think about it today, I will put it off until tomorrow," so on we go with a relatively senseless policy of growth at National which I think has simply got to be stopped for the good economic growth of this area.

I think, Mr. Chairman, that that is going to help in getting the Washington area, the rest of the country complains about Washington being a parasitic area. The better economic growth you induce in this area the better it is going to be for the rest of the country.

One of the spokesmen earlier, Mr. Philion, talked about the wrong-headedness of trying to stop growth. You know only too well the Federal Government has been in the policy of directing growth in the National Capital area for the last 30 to 40 years, highways, Metro, everything under the Sun.

It has tried to make it more sensible, except in the implementation of the metropolitan airport policy. That is why we, for the Committee for Dulles, feel so strongly.

The last point that I want to make to you is simply this:

If the Congress, and I believe it does, if it really wants to develop a balanced, sensible overall transportation policy, obviously an essential part of that is an airline or an airport policy which is balanced for the metropolitan area.

Thank you, sir.

Mr. ANDERSON. Mr. Landfield.

Mr. LANDFIELD. Mr. Chairman, members of the subcommittee, my name is Sherwin Landfield, and I am a member of the executive committee of Virginians for Dulles.

I am making this statement on behalf of State Senator Clive DuVal, who represents the Arlington, Fairfax, Falls Church area of northern Virginia, and who is prevented from appearing before this august group by legislative duties in Richmond.

Senator DuVal is also President of our broadly based citizens organization, Virginians for Dulles, with more than 1,000 members spread along the Virginia side of the Potomac from Alexandria through Arlington into McLean.

We also have members in the District of Columbia and Maryland.

Our members live or work or relax out of the sound of the jets using National Airport. They are part of the tens, even hundreds of thousands of residents of the Metropolitan Washington area harassed by aircraft noise and condemned to exist in what might be described as a noise slum.

It is a privilege and particularly fitting for our group to cooperate with this subcommittee in this hearing, for indeed this meeting today is a direct result of the action 10 years ago when in 1970, it was Virginians for Dulles who brought suit against the FAA in the U.S. District Court Eastern District of Virginia seeking then to restrain overuse of National Airport and the resulting air and noise pollution.

Our first suit was dismissed in the district court. Six years later, the U.S. Court of Appeals for the Fourth Circuit directed the FAA to submit an environmental impact statement on the operation of its two airports.

After lengthy delays, the FAA filed a draft statement in March of 1978. After the hearings, in which many local governments and citizens associations expressed strong opposition, no further action was taken by the FAA until, again, Virginians for Dulles then moved to hold the FAA in contempt of court for its disregard of the Federal court order.

The district court then gave the FAA until January 15 of this year to submit a supplemental draft environmental statement on proposed policy for the airports, which they then did.

This time the FAA was ordered to submit a final impact statement by another fixed date, August 15, 1980.

We are most happy that your subcommittee has taken a direct interest in this matter of the quality of life of so many thousands of citizens of this year.

One of the FAA's basic guidelines for operating close-in airports was set forth in a very recent document just last month. It provides in part that operational policies "must respond as nearly as possible to the desires, attitudes and values of the citizenry."

Further, that "typical metropolitan bodies which could best provide that policy direction are councils of government."

Well, fortunately, we do have such a council of government here, and you have very recently heard from their representative. I will say at this time only that Virginians for Dulles strongly support these COG recommendations.

Measured by them, FAA's current plan for National is totally unsatisfactory and unacceptable. With one difference, we do commend and support the FAA's proposed policy covering night operations under which, for example, air carriers schedule no more operations after 9:30 p.m.

However, for two-thirds of each day, FAA's proposed policy would not provide any perceptible reduction of noise for many years to come.

This is true, because FAA's new plans continue the irrational policy of designating a postage stamp airport design for propeller planes 40 years ago as the principal jet airport for the metropolitan area and the Capital of the United States.

In contrast, Dulles was intended and designed by this Congress to be the jetport for the Nation's Capital, and we must add that BWI also has a large field recently expanded and modernized by the State of Maryland.

Yet, by the year 2000 under the FAA's plan, National would still carry more passengers than either of the other two airports.

Until almost 1990 it would serve more passengers than both of the other two airports combined.

For the period 1981 to 1985, the FAA's proposed policy would place no restrictions on passenger growth at National which would be permitted to rise to 18 million around 1985.

We find this figure arbitrary and mystifying, because a careful reading of the impact statement, as well as the preliminary draft, contains not one word in almost 800 pages which attempt to justify this huge increase.

Noise-wise, we find it intolerable and unacceptable that the proposed policy would do nothing of substance to reduce the current heavy burden on the metropolitan population during the daytime hours for the next 5 years.

Regarding air pollution, we further protest the fact that airport-related emissions would increase around National above the existing levels due to the increase, surface transportation, because of FAA's recommended increase in the use of National Airport.

It is admitted by the FAA that pollution standards would be violated and hydrocarbon violations would similarly continue at all measurement stations around National Airport.

Therefore, the 8 recommendations of Virginians for Dulles are, one, that the proposed policies of minor reductions in air carrier slots at National be considered a first step only to be followed annually by further reductions from the current 40 per hour to 20 by 1985. Those slot reductions could be achieved in part by the introduction of wide-bodied jets on a 1 for 2 basis, if safe, and I think if we had seen the film which was presented this afternoon, we would have said nothing on this point whatsoever.

Two, that the FAA policy plan for reduction of air carrier scheduling and operations during evening and nighttime hours be accepted.

Three, that commuter carrier operations be increased from 8 to 12 per hour, and general aviation hours be continued at 12.

Four, that the annual passenger level not exceed 14 million.

Five, that so-called extra sections of shuttle service be included in the total limit on operations.

Six, that a regional citizens advisory board be established to provide input on aviation policy in the metropolitan area so that the views of the residents may be properly represented in the decisionmaking process.

Seven, that the Department of Transportation and Metro take action to provide frequent, reliable and low-cost service connecting Dulles with the District and with National and, on a longer term basis, arrange to connect Dulles by rail to the Metro system.

Finally, that mandatory noise abatement procedures on landings and take offs be emphasized and improved, and our above eight recommendations, we willingly align ourselves with the position

taken by the newly formed Metropolitan Washington Coalition on Airport Problems, CAP, of which we are a member.

I further understand that the other important issue before the subcommittee today is the question of the desirability of maintaining the Metropolitan Washington airports as federally owned and operated entities.

Our position is that the ownership and operation of National and Dulles by the FAA is highly undesirable, because it clearly involves that agency in a series of potential conflict-of-interest situations.

By law, the FAA must in its ownership and operation of these two airports promote the interests of aviation and the aviation industry has also urged intensive, even expanded use of National, even if this means reduced use of Dulles and BWI.

At the same time, FAA's statutory duty requires it to serve the interests of the general public, and in this instance many, many thousands of residents demand reduced use of National.

Another area of possibly conflict of interest arising out of FAA's ownership of National and Dulles was pointed out by an FAA administrator, Jack Shaffer, when he stated several years ago that, "As airport proprietor, he must of necessity negotiate and deal on a contractual basis with some of the same segments of the aviation industry that he regulates in his capacity as FAA administrator."

Further, the concept of federalism, which gives local governments a voice in these public matters in which they have a clear interest, would argue for allowing those same governments to participate in supervising and regulating the flight operations at Dulles and National.

For these reasons, both Congress and the administration have in the past considered several solutions which would remove FAA from the business of owning and operating airports.

During the 91st Congress, second session, hearings were held in the Senate on S. 3128, introduced by Senator Spong of Virginia.

This bill authorized the States of Virginia and Maryland and the District of Columbia to enter into a compact for the purpose of establishing a regional authority to operate the three major airports within the Washington-Baltimore area.

At that time Senator Spong pointed out that Washington is the only metropolitan area in the Nation without some control over its own airports.

Some years back the Nixon administration also considered a solution similar to that proposed by Senator Spong.

In conclusion, we strongly favor a solution which would avoid the conflicts of interest to which we have alluded and which would better conform to the concept of federalism.

Congress should authorize the States of Virginia and Maryland and the District of Columbia to establish a regional authority to own and operate the National, Dulles, and BWI Airports.

Thank you.

Mr. ANDERSON. Thank you, Mr. Landfield.

Mr. Lewis?

Mr. LEWIS. Mr. Chairman, thank you for permitting me to speak to the committee at this time. I represent both the Committee for National and the Arlington Chamber of Commerce. The statement

which I would like to make on behalf of the Arlington Chamber of Commerce I will read first.

The Arlington Chamber of Commerce represents over 1,300 local businessmen and professionals. The chamber, founded in 1924, is one of the larger voluntary membership organizations in the Commonwealth of Virginia.

There is a vocal minority in the Washington metropolitan area which if it were able, would drastically restrict or even close down Washington National Airport. These individuals see Washington National only in terms of noise and pollution. The valuable service provided the traveling public and the economic importance of the facility to the community are completely ignored. As in many environmental encounters, we have an emotional minority which is demanding an action which could seriously impact a significant number of residents economically. With the rapid technological advances being made in aircraft noise and pollution suppression, local environmentalists will be hard-pressed in a few years to find an acceptable reason for closing down Washington National.

Few areas of the Nation have a major airport so conveniently located and served by modern mass rail transportation. The facility is undoubtedly one of the most significant energy conservers in the area. Washington National has an excellent safety record and provides an unmatched convenient air transportation service for our Federal Government, including Congress and the executive branch.

On the economic side, Washington National serves two important roles. The airport is the major catalyst behind the intense development of Crystal City and Rosslyn. These two northern Virginia areas represent an investment value of \$1.2 billion. As a direct result of Washington National's location, northern Virginia has developed the largest travel industry in the State of Virginia, with over 5,000 motel rooms located in Arlington alone.

The other economic role of Washington National relates to the \$660 million it annually pumps into the local economy. It is the single largest on-site employer in northern Virginia and the second largest in the State. The facility is one of the few Federal installations which operates without the support of tax dollars.

While we are basically in accord with FAA's proposed rules for the operation of Washington National, we urge the committee to request that an economic impact study be made on any proposed rules which will restrict the future growth of the airport. The continued viable existence of this facility is of major concern to the residents of northern Virginia, and it should not be subjected to unwarranted physical restrictions for the benefit of a vocal minority of the population.

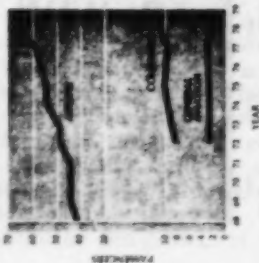
We are in agreement with the continued Federal ownership and operation of Washington National. However, no opposition is expressed to the sale of the facility to the State of Virginia. Under no conditions should the airport be sold to a local government entity, authority, or any combination of such entities or authorities. The latter transaction, in our opinion, would result in the quick demise of this important airport which serves millions of travelers with an unmatched degree of convenience and efficiency and makes a substantial contribution, both direct and indirect, to the local economy.

Speaking as the president of the Committee for National, I will enter this statement also.

The Committee for National is a voluntary group of local businessmen who organized some 8 years ago for the purposes of making Washington National Airport a more viable element in the Nation's air transport system and to publicize the economic importance of the facility. Attached is the Committee for National's 1980 economic brochure on National Airport.

[The information follows:]

566.1 Million Boost to Economy



Programs For Aircraft Operations
Washington National Airport

carrying increasing passenger demands with fewer flights. Airline passengers increased 46 per cent from 1960 to 1970, while total air carrier movements dropped 12 per cent.

Commuter airlines have shown similar increases in productivity. In 1972, the first year for which statistics are available, commuter airlines carried 4 passengers per movement. By 1979, this had climbed to 13 passengers—a 60 per cent increase. During this same period, commuter operations increased 50 per cent, while passengers carried by commuters jumped 153 per cent.

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Newer idea of the magnitude of an travel's role in this contribution can be gained from data supplied by the Washington Convention and Visitors Association. In 1979, there were 4.8 million visitors who spent overnight commercial accommodations in the National Capital area. Of these, 14 per cent came for tourism, 85 per cent for business and 51 per cent for meetings—including conventions. A conservative estimate would have 75 per cent, or 3.5 million of these overnight visitors arriving by air making Washington National's share 2.4 million.

The largest source of Washington's economic growth is the National Business Appraisal from an exacting study of one part of the travel industry—conventions. In the 10th year, there were 105,000 delegates attending 1,000 conventions. They stayed an average of two days and spent \$100 per delegate, contributing \$10.5 million to the area's economy. Of this, \$4.5 million went to the state's economy.

According to Robert L. Gratton, chairman of the Arlington County Visitors Commission, "The Washington area's largest private economic generator—the travel industry—would not exist without the Washington Convention Center. It is the only building on such a significant location if it were not for the Washington Convention Center. No one can deny the importance of the Convention Center to the Washington area's economy."

Washington's second volume is directly attributable to the National Airport.

More Passengers, Fewer Flights

Another agency, the Federal Reserve, is a Washington National on the local economy and the complex issues. Kenneth W. Phillips, president of the Washington National, says the impact of the Arlington project is "a very real one." Phillips, who is also president of the Arlington Chamber of Commerce, says, "Local revenues from Washington National Airport has been a major economic stimulus in the development of the beltway Davis corridor of Arlington and to a lesser but still important degree of Bethesda. The original combination of an airport, a highway, and a shopping center has been a major factor in the Nation's capital together with the location and availability of commercially sound investment opportunities." Phillips adds that the benefits realized in Arlington enjoying the tax benefits generated by over \$1 billion in land sales and improvements in these areas.

Comparisons between this ex-ante impact study of Washington National Airport and the study 11 years earlier show that the airport has

employees, such as grocery store clerks and managers, automobile mechanics, department store salespeople and all those who build, maintain, and sell housing.

Impact of Employee Spending

Wages and salaries earned at the airport are spent where the employees and their families live—\$33 million for housing, \$37 million for food, \$13 million for clothing and personal care, and \$12 million for transportation, for example. These dollars, in turn, form the basis for wages and salaries paid to a wide variety of area

Following the generally accepted rule that each dollar spent is "recycled" to create at least another dollar of income, this means that Washington National Airport contributes more than \$631 million to the economy of the National Capital area.

Visitors Are Big Business

Washington National's close-in convenience serves as a magnet for visitors to the National Capital area, and the money these visitors spend contributes to the support of thousands of other jobs in the area. Travel and tourism bring \$1 billion to the local economy and produce \$46 million of local income.

Local Revenue	\$ 61,844,659
Local Taxes	37,247,910
Local Fees	7,193,489
Local Transportation	1,754,793
Local Transportation & Significance	1,754,793
Local	1,754,793
Total	\$43,876,689

Source: Washington Commission & Voters Association

Source: Websters Connection & Webster's Association

Impact of Employee Spending

Wages and salaries earned at the airport are spent where the employees and their families live—\$33 million for housing, \$37 million for food, \$13 million for clothing and personal care, and \$12 million for transportation, for example. These dollars, in turn, form the basis for wages and salaries paid to a wide variety of an-

Washington National Airport Employees Where They Live						
County & City	Population	Family Members	Average House Value	Average Annual Yield	Average Annual Income	Average Number Autos
Virginia						
Arlington	491	1,113	\$ 86,470	\$344	\$26,747	1.83
Fairfax County (city)	1,000	2,200	\$ 100,000	375	27,500	1.80
Fairfax County (suburb)	7,240	17,240	99,540	375	27,540	1.49
Fredricksburg	119	338	86,790	228	20,248	2.38
Prince Georges	2,100	5,100	\$ 92,119	366	25,145	2.13
Total	4,831	12,103	\$ 93,413	373	\$23,345	2.11
Maryland						
Anne Arundel	239	761	\$326,689	\$150	\$39,254	2.35
Montgomery	153	389	88,370	75	23,813	2.19
Prince Georges	197	528	91,175	264	28,189	2.39
Total	1,486	4,716	\$ 91,373	\$389	\$32,312	2.18
District of Columbia						
Washington	574	1,443	\$ 74,119	\$139	\$16,538	1.71
Total	7,386	2,657	\$27,106	\$344	\$27,106	2.49
Total	13,693	31,466	\$ 93,237	\$369	\$32,966	2.14

	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	Total
Fuel	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Lubricating	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Competition	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Cooling and Ventilation	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Medical Care	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Medical Security and Liability Payments	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Personal Income Taxes	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Other	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Total	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000

*Includes 10% in "Other" locations.

More than 15 million passengers travelling to and from Washington via scheduled airlines, commuter airlines, air taxis, private and corporate aircraft, used Washington National Airport last year. These passengers chose National because it offers convenient, close-in, and frequent air service.

But an airport's contribution to the community it serves is not limited to convenience and safety. Like any large factory, mill, or assembly plant, an airport also contributes to the economic strength and vitality of its area through the jobs it provides and the money it pours into the local economy. With nearly 7,326 employees whose average annual income is \$23,000, Washington National is one of the area's largest non-government employers.

The Economic Impact of Washington National Airport as a Gateway	
Employee payroll	\$167,564,000
Direct expenditures	\$ 71,326,465
Indirect expenditures	\$ 13,768,441
Total expenditures for final products and services	\$ 252,658,906
Indirect expenditures for final products and services	\$ 40,006,816
Total expenditures	\$ 413,665,722
Indirect expenditures	\$ 118,016,914
Total expenditures	\$ 531,682,636
Indirect expenditures	\$ 1,482,663
Total expenditures	\$ 1,484,145
Indirect expenditures	\$ 1,482,613
Total expenditures	\$ 1,484,128
Indirect expenditures	\$ 6,635,577
Total expenditures	\$ 1,432,329
Indirect expenditures	\$ 329,363,466
Total expenditures	\$661,147,279

National Airport's economic impact on the Washington Metropolitan area last year amounted to \$661 million. Contributing to this economic impact are a \$147 million annual payroll, \$110 million in local expenditures and \$71 million in revenue collected by airport tenants serving those who use the airport. With the addition of \$1 million in local taxes paid by the

Mr. LEWIS. We would like to reemphasize our position regarding the recent policy statement issued by the FAA as it relates to National Airport.

The reduction of slots to 36 an hour seems to be overrestrictive and should be worked out on an overall daily basis versus an hourly basis. The question of commuter aircrafts versus private aircrafts would appear to be secondary in the consideration of the policy of the airport, but certainly commuter aircrafts should be given priority since they affect a larger number of people.

The absolute curfew of 10:30 p.m. should be reconsidered and redefined so that any aircraft scheduled to land at National Airport should be allowed to land, regardless of time. We do not feel that the traveling public should be inconvenienced by having to land at Dulles or BWI in the middle of the night and then attempt to rearrange overnight accommodations or their early morning meetings. The frequency of aircrafts arriving after the curfew would have a minimal effect on the overall policy.

First of all, if the dumped passenger is from the Washington metropolitan area he/she will be inconvenienced by making either phone calls to have themselves picked up at alternate locations, or perhaps at great additional expense, travel via rent-a-car, limo, or taxi to Washington National to either greet the people which are awaiting his/her arrival or so that the passenger might pick up his car which was parked at Washington National Airport.

Second, if the metro Washington area is not home base, the dumped passenger must make expensive alternate ground transportation plans, local and long-distance phone calls, and perhaps alternate hotel accommodations.

The 18 million passenger restrictions for 1985 should be reevaluated to show only originating and terminating passengers. The airport will be handling over 1 million passengers who will merely transfer from one plane to another and therefore have little impact on the overall capacity of the terminal.

The restriction of the number of passengers using National Airport should be reevaluated on a yearly basis, depending upon modernization of the building and roadways, and the ability of the airport to handle a larger number of passengers more efficiently as the facilities are improved. We feel that to put an absolute maximum limit on the growth of the airport would be unrealistic at this time.

The nonstop perimeter for National appears to be more realistic when a 1,000-mile perimeter is used. We feel that the traveling public should not be discriminated against, regardless of whether their city is one of the grandfather cities or not.

The noise-efficient wide-body aircraft should be allowed to use National Airport, assuming that it follows the safety recommendations presented earlier. The new type aircrafts DC-10, L-1011, and airbus were built to reduce noise pollution at the airports and would help reduce both noise pollution and number of flights operating at National Airport.

Our Metro system was built and conceived with an airport stop because of the convenience that close-in National Airport had for frequent travelers. We believe that this facility should be utilized to its fullest extent, and we believe that building a Metro system to

Dulles is neither economically nor energy efficient at the present time.

The need to renovate and update National terminal, parking, and roadway system has been a known fact for many years. The problems that most people associate with National Airport such as traffic jams, inadequate parking, and cab lines could be corrected by modernization of the facility. The rebuilding of Baltimore-Washington International is a good example of how problems can be solved through rebuilding.

The Committee for National would like to urge the FAA to publish a policy so that the modernization of National Airport, which has been talked about for the last 10 years, can move forward. We feel that modernization should include a two-level roadway system, parking garages, and new wide-body terminal gates to replace the inadequate central and north terminals. We also agree with the initial proposal of runway extension, no matter how small.

Additionally add to my comments that I do live under the flight path in the Potomac area of Washington National Airport.

Thank you.

Mr. ANDERSON. Thank you, Mr. Lewis.

Do the panel members believe that it is proper for the Federal Government to intervene, to influence the airlines' decisions as to the airports they will serve, apart from the problems of noise and the capacity of the air traffic control system?

Mr. BERNTHAL. Mr. Chairman, I think the answer to that is simply yes, and only because the Federal Government is operating the airports there. If the Federal Government were not an airport operator in Washington, it would not be necessary to have that intervention, but as long as these airports are owned by the Federal Government, the duty falls to the Federal Government to operate these airports in a rational and responsible way. It seems to me that any policy which permits an airport built in 1941 to handle propeller-driven aircraft to handle 70 percent of the area's jets, and leaves an airport built in 1962 to handle jets with only 15 percent of those jets, is not a rational policy, and so I think the Federal Government intervention is compelled by the role the Federal Government has chosen to play with respect to these airports.

Mr. WILLIAMS. I agree emphatically, Mr. Chairman. I think that there definitely is a place for the Government to place a ceiling. I do not think I said it, but Dulles has lost 40 scheduled flights in the last year, and 20 percent of its passengers.

Mr. ANDERSON. Mr. Landfield?

Mr. LANDFIELD. Until the two airports in northern Virginia are put on the same basis as all the other airports of the United States, varying degrees of responsiveness to local cities, States, and regions, the frustrated and angry citizens of this area will have to call on every level of government, and every type of government, whether executive, legislative, or judicial, and pray for their intervention.

Mr. LEWIS. I would only add our comment, which most likely would relate to the fact that in that we have the situation that is brought about upon us today is a result of a lot of Government control in the airports in an area or a time of decontrol now. It is

probably important that there be some liaison until we get to a time where perhaps the airports are operated by perhaps the State agency.

Mr. WILLIAMS. Mr. Chairman, may I add one thing, please. The allocation of slots at National Airport is left up to a committee composed of airline representatives, and this is permitted under the FAA regulations. I think that there should definitely be more direct control, either by the FAA or by statute over the allocation of those slots. For example, recently Midway out of Chicago opened up I think four flights a day each way into and out of National and to Midway at Chicago. As Mr. Bernthal said, there is one flight out of Dulles to Chicago per day, but you cannot get back. You cannot get back. Yet you have got four each day into and out of National. The allocation committee ought to be controlled much more definitely by the Government and less by the airlines.

Mr. ANDERSON. Some panel members propose a regional airport authority instead of Federal ownership of the Washington airports. Can you give us more description of what you have in mind? Would it be similar to the authority that governs the Metro system, and if so, how could we avoid the disputes that have arisen between the various jurisdictions over Metro finances?

Mr. BERNTHAL. That is a hard question, Mr. Chairman, because the idea of transferring Federal control to local control, which was suggested by the committee, is one that has been dormant for a long, long time. I would think that at least ideally we could develop a port authority concept, like that in New York. It seems to work with a reasonable amount of success where New Jersey and New York have given control of Newark and—well, it is not just the airports there, but they are given control of their transit facilities to a regional authority, recognizing that transportation is a regional problem and not a local one.

As to membership on this authority, I think obviously each of the jurisdictions that is so vitally affected by these airports is going to have to have membership or the idea will not work.

I would also advocate membership on the authority of local citizenry, the airline industry itself, perhaps the Air Passengers Association. It seems to me that you have got to have all views present in order to work out a rational policy, but I cannot think of a more inefficient way to do it than the way we do it today, where the Secretary of Transportation and this committee and the FAA administrator have to worry about how to run these local airports.

Mr. ANDERSON. Do the citizen and business groups that you represent believe the FAA does an adequate job in consulting the community on its airport policy decisions, and do you suggest any additional mechanisms for this purpose?

Mr. BERNTHAL. Well, first of all I will have to give them this. Ten years ago and before, and up until perhaps even just a few years ago, the FAA not only did not really consult with the community, but routinely lied to it. There was open deception of the community, and I would think that right now while that reputation lingers among most of the citizens who have to live with this problem, most people hate the FAA, do not trust the FAA, want nothing to do with the FAA. I must concede that in the last couple of years I think there has been a far greater sensitivity at the FAA to com-

munity problems. I think they perceive themselves to be caught terribly on the horns of a dilemma, wanting to provide what is rationally necessary and what the citizens are demanding, and yet fearing not only the airlines, but more than that, Congress.

We met with Administrator Bond last week, and the one point that came out over and over and over again was his concern of what Congress would and would not permit the FAA to do. So while I think there is a greater sensitivity there, the fact is that no, there certainly is not the degree of responsiveness we would like.

We have advocated an advisory committee, which would certainly be a modest first step if not toward local ownership at least toward local input in airport policy formulation. We would support that very strongly.

Mr. WILLIAMS. Mr. Chairman, the Committee for Dulles has a good working relationship with the FAA. However, we are constrained to say we do not think they listen enough. I will give you a precise example.

The mobile lounges at Dulles Airport are an additional cost factor to the airlines. The airlines complain bitterly about this. We have tried to get the FAA to reduce the costs, and yet they say they cannot. Yet the number of flights decrease and therefore the per-passenger cost of operating those mobile lounges goes up and the airports have to pay more for the use of them, so as the 40 flights have been taken out of Dulles in the last year, the operating costs for the airlines that stay there have gone up. That is just one example, and we cannot get the FAA to listen to us on that.

Mr. LANDFIELD. Mr. Chairman, I wish I could agree that the FAA has become more responsive. I cannot, because I have entered into this kind of activism relatively recently. I can only say that within the period of the last 2 years, that the FAA seems most responsive when it has had its hearings to those groups with whom it has more daily or weekly contacts, and I think this is essentially the aviation industry. This is perfectly understandable. They speak to a considerable extent the same language, but if you even try to find out when the FAA hearings are to be conducted, you can call them and be told that they have already printed them, and if you say that you have searched the newspapers for weeks for notice of the time and place, they will refer you to the classified ads, and sure enough if you go back there was a legal notice, very long in very small print, and somehow your own local organizations, if you belong to three or four, none of them ever received the news.

I think this is all part of the dilemma which has been expressed. They are caught between two fires, and I think it was very perceptive of this subcommittee to suggest in the second agenda item that they be removed from one of these fires, and thereby avoid grave conflicts of interest between the mass of the public citizens around and the larger Federal questions with which they have been charged.

On the previous question of the various options to organize such a new authority, may I suggest that the particular suggestion made by Virginians for Dulles was not intended to be rigid, even though it was couched in those terms. I think there are at least half a dozen viable fashions to organize such a new authority, and I think

inasmuch as these are the only two airports that are not organized in such a fashion, we simply need to turn the Department of Transportation loose on all the rest, and let them show us a half dozen options which have been the most successful, and let the legislative groups decide which ones seem to them with appropriate hearings to pertain to the circumstances at hand.

Mr. BERNTHAL. If I may add one other comment, too, I did not mean to imply that CAP in any way endorses the FAA-proposed policy. I think that it is very important that the subcommittee consider the impact of a 50-percent reduction at National as against what the FAA is proposing. The four-slot-per-hour reduction we do not believe will either generate any meaningful noise relief for the community nor in any way correct the gross imbalance among the region's airports. In particular our concern is that there must be a policy which clearly tells the airlines, gives them something to plan around, and tells them that over the next x number of years National is going to be reduced to only an equal partner with the other regional airports, and you must plan around that.

A 50-percent slot reduction at National phased in on a fixed basis over 3 or 4 years or 5 years, whatever it takes, would do that. It would tell the airlines that they have got to give up 3 or 4 slots this year, 3 or 4 slots the following year, 3 or 4 slots the following year, and then and only then are the airlines going to give up the captive audience that they have now.

It is a great deal for them now. They can force virtually all Washington-bound air travelers into National Airport whether they like it or not. Sure, anybody who is coming for a business meeting downtown would prefer it, but there are an awful lot of people who would affirmatively prefer to fly into Dulles or BWI. There are others for whom the airport they land in is simply not that significant. But the airlines do not want the cost of building, staffing, and maintaining facilities at three airports when they can do it at one. There is no way they are going to do it voluntarily, and a four-slot-per-hour reduction this year, with future reductions predicated on wide-bodies, after what you have heard today ought to convince you is not the way to go.

Mr. LEWIS. I would clarify or add to the prior question, which was asked about the controlling authority. Our concern is we have discussed this in some detail in relating to a regional body taking over operation of the airport gets right down to the economics of that particular body, and will it have the economic resources, the bonding authority, necessary in order to I would say handle all of the economic problems that will relate to or the expense that would relate to operating National Airport and/or Dulles Airport.

To the question about the FAA's sensitivity or insensitivity as to whether they were listening, I would only say that there are some diametrically opposing facts that I have heard about, trying to simplify the problem only as noise, and another saying it is only economic, and our view has been that it is really not a simple question. Therefore, it would be hard for the FAA or any group to satisfy everybody. I do not think it can be satisfied that simply.

Then to hear Secretary Goldschmidt come in and say that it is a dump, he is also saying that well, the FAA since the period of time

that it has been operating the airport has done relatively little to upgrade the facility or to make it a presentable airport, and looking at airports around the country, I am hard-put to understand why there have not been improvements to National Airport. That I think is a part of the bureaucratic redtape that might be necessary in order to present what might be viable changes to the passengers coming into the terminal.

I would last speak to the idea of forcing people into National Airport or Dulles or to any particular airport. Being an operator of a 400-room hotel, I can tell you that there are a heck of a lot of people that want to be forced into Washington National Airport, and not once a week or once every 3 months. It is sometimes four and five times a week, and I do not say that these people are citizens, but they are a part of the business that we do in the Washington area, and I think it will be economically inefficient for us to just assume that by redirecting flights to Dulles that automatically all of their problems will be taken care of, because they do do a considerable amount of their business here on the Hill, and a lot of them are trying to fly in and out on a day-by-day basis.

Mr. ANDERSON. Would it be worth the cost to improve ground access to Dulles and BWI? There have been proposals for rapid transit and more bus service. These can be very expensive propositions. Where would the money come from?

Mr. BERNTHAL. The rapid rail service to BWI is there, and will become operational this year or may be already, I am not really sure. So as far as BWI is concerned, the rail transit is there.

I have been listening to you ask that question about Dulles Metro all day, and I have been scratching my head trying to think of a good answer to it, and I have not been able to come up with one even though it is 5 o'clock and I have had 7 hours to do it. We know realistically that Metro to Dulles would be terrific. We do not know where the money is going to come from. We do not know what the economic conditions will be long-term, but basically I think access to Dulles and ground transportation to Dulles is largely a chicken-and-egg problem. For the most part better bus and taxi and limousine service to Dulles is naturally going to follow the transfer of flights out there. There will be economic incentives for operators to start providing more, better, more efficient and more comfortable service to Dulles.

The I-66 connector should also help on the automobile access, and I would ask the committee to bear one thing in mind on this question. Not everybody who wants to use Dulles or who would use Dulles is going to or from Washington, D.C. Two-thirds of the population of this region live outside the city of Washington, and for them they are more likely to be coming from Fairfax County, Montgomery County, in the case of BWI, Prince Georges County, and they may not be going to downtown Washington. So while we are the first to concede that Dulles is farther away from Washington than National, and that access is not great, the problem is not quite as black and white as some people have presented. Sure, we would love rapid rail out there. We do not know where the money is going to come from. That is an ultimate long-term solution.

Mr. WILLIAMS. Mr. Chairman, I think that rapid rail to Dulles is very frankly a pipedream for the very considerable future. The

present Metro system is tremendously expensive. I have been up against the taxpayers trying to raise money for it when I was in the general assembly of Virginia. It is a tough proposition, and to add this cost on I think is totally unrealistic at this time. I would suggest that the best thing to do would be fast bus service out the Dulles Access Road connected up with I-66, and coming either directly into Washington on I-66 or to the Metro station in northern Virginia, Clarendon, in that area. Again, I think that is a much better interim solution, but there has to be a much faster service. A new service has been instituted at Dulles since Greyhound pulled out. I think it will be a substantial improvement. That is a privately owned service, of course.

Mr. LANDFIELD. One way of responding to the question, and this is not intended to be flip, is to say that the money for proper transportation to a modern airport in our region is worth the cost, to the extent it is worth it in every important capital of the world.

The money will come from the same places it came from to provide to those great cities and capitals. Granted, it is a chicken and egg situation. Whenever you ask why there isn't good transportation out to Dulles, you are both, well, there isn't a demand, not enough people are going out there, and if you ask why enough people aren't going out there and why there isn't a demand, they say because there isn't enough good transportation.

Planning requires both steps simultaneously. A determination, Dulles Airport was built for a reason which must now be accomplished, and at the same time logical steps, transportation must be approved to make it viable.

When buses go out with five times the frequency for five times the number of passengers, somebody will calculate that what we really need is a railroad.

Mr. BERNTHAL. I would suggest further the reason people don't use Dulles is that there are no flights at Dulles. I tried to point out in my testimony how American cities have no service from Dulles at all, how skewed the imbalance is between Dulles and National, that 59 out of 60 Washington-Chicago operations as between just those two airports use National.

Of 90 operations, between Atlanta and Washington, 6 use Dulles. All these other cities have no service from Dulles at all, and we talk about National as short-haul. Many of these cities are out in the Far West, and you can't get there from Dulles.

It strains one's belief that there is no demand in Fairfax and Montgomery Counties; for example, those are two counties where people would affirmatively prefer to use Dulles. It is strange there is no demand in those counties for flights to Chicago from Dulles. Nobody wants to go and have to buck rush hour traffic in the morning to drive to National. People on Capitol Hill would prefer to use National.

There are no flights offered at Dulles, and that is why it is unutilized.

Mr. WILLIAMS. The suggestion was made by Mr. Lewis about an economic survey. I would love to see an economic survey that was fairly done. We have tried to get such from the FAA, and the Committee for Dulles has and we have never been successful, so that now we are trying to raise private money for some kind of a

market survey to show the demand for Dulles and take that and shake it in the face of the airlines and maybe they will start listening to us.

But at the present time we simply have not had the means to have that survey made, and the Government has not had it made for us.

I hope that the private initiative that we are undertaking will produce something that will come up with hard facts and figures.

May I add one other thing apropos of the airlines? I am not throwing rocks at them, but I would like to say this for them.

When Dulles was built the whole concept was that the long-range aircraft, the big aircraft would be out on the field and the mobile lounges would go out to them, but the commuter planes would come right up to the terminal.

FAA does not permit that. The commuter planes can't come up to the terminal. They have to be ferried out, and the passengers carried back and forth just like the big ones, again a change in policy by the FAA which hurts Dulles.

Mr. ANDERSON. Mr. Lewis, do you believe National Airport is an economic plus? Have you considered the economic costs in your evaluation?

What about the costs of noise pollution, congestion, loss of land values, and loss of the tax base?

Mr. LEWIS. I would first say that living under the flight path might answer the question about noise pollution.

Being at the southern end of the flight path, I do hear the noise pollution, and I operate a hotel in Crystal City which is very close to the noise, and I think it is one of those trade-off items to me, saying I can't have my cake and eat it too.

I do not know of a silent aircraft today, economically. I would say that having looked at my neighbor's house, who just sold his house to move to a much more expensive place inside of 7 months, the property value at which he is selling his house went up 21 percent, so I have not seen this instance of declining property values.

I am not aware of any of them.

Mr. LANDFIELD. May I add a comment on that? It was just yesterday that I found out the results of a research study commissioned by the Department of Transportation 2 years ago, and which never seems to have reached broad daylight.

The University of Pennsylvania was given \$42,000 to find out if there were any direct economic relationship between the market value of private residential dwellings and decibels of noise from jet airports, exactly the sort of thing we are talking about.

They researched in seven major metropolitan areas of the United States. Their conclusion, there is a drop of one-half percent in the market value of a home for every 1 decibel rise in sound from proximity to a jet airport.

I don't know whatever happened to the study, but I remember that those who doubt that there are economic considerations on both sides of the question, search it out.

Mr. LEWIS. I would only add in that, our inflation in this area is uncontrolled, that the economic study in my opinion would be of no value at all.

I think it would tend to outweigh the impact of inflation.

Sir, did I fully answer your question? I don't know if I heard both of them about the noise and the economic impact.

Mr. ANDERSON. I think you did. Most members of the panel seem to believe, though, some mistakes have been made in planning and development of National Airport.

How could we make sure that in the future development of Dulles and BWI, positive aspects of development are maximized and the negative minimized?

If the mistakes of the past are repeated, we might end up transferring the problems of National to another locality.

Mr. BERNTHAL. Of course, most of the bad mistakes of National were made before there were jets, so they couldn't help but have been made. Nobody knew what the problem was going to be and, conversely, at Dulles most of the mistakes have been corrected right from the beginning.

National Airport is a 700-acre plot of land in the middle of a metropolitan area. Dulles is 10,000 acres. It has built-in noise buffers. It is located in a rural area. The most serious and most egregious kinds of noise impacts in Rosslyn and Georgetown and Old Town cannot be repeated at Dulles because of the planning that has already taken place.

However, it is also true that if we perpetuate, as the FAA's proposed policy does the total uncertainty, the total problem of not knowing when or if National is ever going to be reduced or closed down, if we just leave this thing up in the air for another 10 years, there will be an inevitable encroachment on Dulles Airport.

What we need is a fixed, firm policy now. We need a policy that says we are going to reduce this number of slots this year, this number next year, this number the following year.

That is going to give the airlines something firm to plan around, and it will give the developers out at Dulles notice and something definite to work with, that the air traffic at Dulles is going to increase on a definite fixed basis, plus whatever growth there may be over time.

But what FAA is proposing to do is to cut back four slots now and then we will see what happens as time goes on. They like the idea of future reductions, but what they are talking about is letting passenger growth go up to 18 million, and then there will be reductions in slots as more wide bodies come in.

We don't even know if any wide bodies can come in, so we are calling for a fixed schedule of slot reductions working up to a total of 50 percent over time which will still leave National a vital part of our air transport system, but will give everybody something firm and definite to plan on so these mistakes won't occur.

Mr. LEWIS. I do believe in transferring a problem, whether in terms of aircraft or people, that noise is a relative problem. I have two members on my staff at the hotel who do live in the Dulles area, contrary to any testimony you have heard today.

They are complaining about airport noise at Dulles, not by themselves, but neighbors who are talking to them, so I do believe in fact that eventually the problem will surface in terms of noise complaints at Dulles as it does at the present time at Washington National.

Mr. LANDFIELD. If I could relate a personal story, about 30 years ago a friend of mine, when I was in a particularly blue funk, said: "Landfield, don't you ever worry about making a contribution to society. You will serve well if only as a horrible example to the rest."

This is the situation at National Airport. We never need worry about the economic benefit of that little postage stamp, because it serves as a horrible example to all the other airports in the United States.

If we use the resources of the Department of Transportation and what they have learned in studying and controlling the airports of the rest of the United States, we can turn this disaster of National to a model airport for the community out at Dulles with careful planning that will be a model to the rest of the country.

Mr. WILLIAMS. Just add this, if I may, I think that the planning around Dulles has been good. I am not familiar with BWI particularly, but it seems to me to get back to what I said earlier, the point I made was that if you look at the long-term economic planning and the growth of this area, the thrust is definitely more to the west in Virginia and in Maryland, and that thrust is going to continue because that is where the space is and the most attractive features are.

If you consider that, then it seems to me that a comprehensive, balanced airport policy for all this area is going to militate obviously in favor of the kind of planning that has been done at Dulles and at BWI.

The other point I want to make is this:

I happen to be a member of a group which is the International Trade Association of Northern Virginia, but it represents the whole metropolitan area, and we are very much encouraged by the growth of international trade into and out of this area.

I envision a time when Dulles and BWI particularly, with their facilities, will be really one of the No. 1, if not the No. 1 gateway to the United States from Europe and the Middle East.

It is now New York, and I think that pattern is going to change and sensible planning dictates, it seems to me, that we build up the facilities and the usage at Dulles and at BWI.

Mr. ANDERSON. Mr. Fary?

Mr. FARY. Thank you, Mr. Chairman.

I don't have too much to add to the rather difficult hearing we have been having, because I am a Midway resident and a Midway fan.

Midway Airport flying saves me 2½ hours, one-third the cost, and it is comparatively quiet. I live across from St. Peters Church, and have church bells at 7 o'clock every morning which used to disturb me and get me up.

All of a sudden I don't hear them anymore. I called Father O'Sullivan up one day and said, "Hey, Father, did the belfry breakdown? What happened?"

He said, "No; the bells rang this morning."

I said, "I didn't hear them."

I stood on the ground at Dulles and listened to the Concorde come in and I determined that we have a lot of American planes louder than the Concorde. It came in when the French plane and

when the British plane came in. I have seen people move close to airports, knowing there is an airport there, and they would scream about the noise.

Now, suppose we just pass some legislation to reduce the noise and fortunately the committee, assuming they do set up a helicopter setup transporting people from one airport, from Dulles or from National to somewhere in the center of the city on a tall building, hotel or something, it is always going to bother somebody, so I don't know whether that is the price of progress or not.

I want you to know we are a part of it, too, and we are trying to do something to settle things, get it down to a point where it makes everybody happy.

The greatest example is when that clock buzzes we are required to go out there and vote on some bills, and we have a couple of them that are really hot potatoes.

You are friends with the people, if you vote for the proponents of the bill, if you vote their way; you are a hero when you get home and if you vote with the opponents you are a bum, so here we are sitting up here gazing and watching and listening and trying to do our best.

Thank you, gentlemen.

Mr. ANDERSON. You will never be a bum.

Mr. BERNTHAL. You couldn't be a bum and have to sit through this whole thing today.

You have to be a saint to have that kind of patience.

Mr. ANDERSON. Thank you very much.

That completes our hearing, at least for today.

We will reconvene tomorrow morning with a new set of witnesses on the same subject.

Thank you very much for your testimony.

The meeting is recessed.

[Whereupon, at 5:17 p.m. the Subcommittee on Aviation of the Committee on Public Works recessed, to reconvene Thursday, June 12, 1980.]

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DOT/FAA PROPOSED NEW POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

THURSDAY, JUNE 12, 1980

**HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON AVIATION,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
Washington, D.C.**

The subcommittee convened at 10:16 a.m., in room 2167, Rayburn House Office Building, Hon. Glenn M. Anderson (chairman of the subcommittee) presiding.

Mr. ANDERSON. The meeting of the subcommittee will come to order. We have a rather long list of members that want to be heard today, and I do not know which one to pick first. But I have been told that Lindy has to leave right away, and so on the better part of judgment, Lindy Boggs, you will be first.

TESTIMONY OF HON. LINDY BOGGS, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF LOUISIANA

Mrs. BOGGS. Perhaps alphabetically, it works out, too. Thank you so much, Mr. Chairman and members of the committee.

I am really very pleased to be able to be here today, and I would like to simply summarize my testimony and ask that the whole of it be printed in the record.

Mr. ANDERSON. Your statement will be made a matter of the record, Lindy, and we would like to have you extemporize.

Mrs. BOGGS. Mr. Chairman, I appear before you today not only in behalf of my own district, which includes parts of the city of New Orleans and of Jefferson Parish, but also on behalf of the entire Louisiana delegation. In addition you will also hear from the newest member of our Louisiana delegation, Congressman Billy Tauzin, in a little while.

As you know, New Orleans is a major tourist center. We have conventions and tourism, and next to our port activities, the tourism really accounts for a large part of our economy. Of our employment, 6 percent is directly related to support of tourist activities, and 10 percent of our retail sales are linked to tourism.

In addition to that, Mr. Chairman, we have many facilities of the Federal Government spread throughout the area, which means that people must travel back and forth to Washington offices of the Government. And in addition, of course, many of the people in the area do business with their Government in Washington and must come directly here, who are in the businesses and professions and have to do business with their Government.

And I can tell you as one who uses National at least two times a week, sometimes four times a week, of the service between Wash-

ington and New Orleans and between New Orleans and other major cities of the country, that the service between New Orleans and Washington is positively the most awkward and the most time-consuming and the most difficult of them all. We feel that the city of New Orleans is really being discriminated against because we cannot have direct contact with the Capital of our country.

We have been pleased to learn, then, that late last year, the Department of Transportation and the Federal Aviation Administration, DOT/FAA, was proposing a Washington metropolitan airports policy which, among other changes, would permit nonstop New Orleans-Washington National service, and after so many years of acquiescence to the situation that we have endured it was truly gratifying to all of us from Louisiana that the administration and Secretary Goldschmidt are addressing this issue formally.

Now, I do not know all of the technical aspects of this report, but I do have with me Charles Kurth, who was one of the persons who helped to prepare the responses to the DOT/FAA report, for the city of New Orleans. He will be able to address any technical questions you may have.

I know it is a complex issue, but I am sure that a very well-balanced solution was proposed by FAA/DOT, to a host of complex and interrelated issues. And I believe the key ingredient is the fact that it maintains some balance.

As you know, the proposed policy includes a provision which would eliminate the discriminatory aspects of the current informal perimeter rule by treating equally all of the cities within 1,000 miles of the Washington airport. In response to the DOT/FAA request for comments on the proposed policy, the New Orleans parties, the chamber of New Orleans and the River Region, the city of New Orleans, the State transportation agency, prepared a report which says that, the original 1966 agreement accepted 1,000 miles as the actual nonstop perimeter, that the majority of the current New Orleans-Washington traffic now uses National Airport and thus would not be new to the facility, that a significant portion of these passengers are now required to transit overcrowded, intermediate cities, and that even in the unlikely event that all New Orleans-Washington traffic moved on nonstop flights, only 1.6 percent daily flights would be required to accommodate all passengers at National, and that with the numerous existing New Orleans-National one-stop flights, operations at Washington National need to increase to accommodate the limited nonstop service required to move the New Orleans-Washington traffic.

This analysis supports the DOT/FAA conclusion that a uniform, nondiscriminatory, 1,000-mile perimeter would—and I quote—"improve access to the Nation's Capital without placing any appreciable further environmental burden on the surrounding community."

Mr. Chairman and members of the committee, I know that this proposal would be very useful to all of us. There is no way that the Members of Congress and other members of our area that are doing business with their Government can leave and come to Washington from the New Orleans area in the morning. We cannot arrive here, even leaving very early in the morning, in time for a congressional session. We cannot leave New Orleans in the morning and arrive at National Airport, do a day of business with our

Government, and return in the afternoon. It is a very, very discriminatory practice, not only to us, but it impacts upon our tourist trade, our convention trade, etc. We really do think that it is very discriminatory.

Now, we not only cannot arrive here in time for a congressional session, Mr. Chairman, but when we stop at intermediate stops, it is always at very overcrowded airports, and it is very, very time consuming. Even the time schedules that are supposed to be met cannot be met because of it.

The Louisiana delegation has formally supported the DOT/FAA proposed 1,000-mile perimeter, and on behalf of your colleagues in the delegation and of mine from Louisiana, I urge you to support the efforts of DOT/FAA to develop a well-balanced policy for the Metropolitan Washington airports.

I do thank you very much for the opportunity to plead with you to allow us at long last to have the convenience that the other cities of this country enjoy, and I would hope that you would take our proposal very seriously and consider it very favorably.

Mr. ANDERSON. Thank you, Lindy.

Lindy, one apparent result of the perimeter rule seems to be that the airlines schedule one-stop service from National Airport to cities outside the perimeter, like in your case, they stop in Atlanta before they go to New Orleans—

Mrs. BOGGS. Mr. Chairman, excuse me. They say that we will probably have to stop in Atlanta to go to heaven or hell.

Mr. ANDERSON. This may result in an economic inefficiency by encouraging excessive service to intermediate cities within the perimeter and by not allowing nonstop service to cities which can support it.

Would it be better to eliminate the perimeter rule and leave the scheduling decisions to the marketplace?

Mrs. BOGGS. Mr. Chairman, I would assume that the marketplace would have to do the scheduling, but if we could remove the perimeter rule, I do feel that it would be in the best interest of the marketplace to have nonstop flights from New Orleans to Washington.

Mr. ANDERSON. Yesterday, we heard testimony that the development of the I-66 and the Dulles access road, which will be completed in the next 2 years, will make it possible to travel on interstate highways from Dulles Airport to downtown Washington, and would probably reduce the travel time from Dulles by about 15 minutes.

My question on that is, would these improvements make service to Dulles substantially more attractive to your constituents? Before you answer that, I will say that I fly to Los Angeles almost every week I think last year, I made 43 trips, which is almost every week. A couple of times, I had to go by way of National. Every time I have gone out of National I have had to sit out there for 30 to 45 minutes, or even longer, waiting for a plane to be scheduled out, or for some other reason. When I go to Dulles, we usually go right out. And I have often wondered what is so attractive about National, when you have the tremendous congestion there that makes getting out very difficult. At these other airports, either BWI or Dulles, there is much better service at the airport, and if we could somehow shorten the travel time between Washington and the two

major outside airports the service could be even better. That is the thrust of my question.

For example, I am disappointed when I cannot go to Dulles and fly out, and have to go to National and have a one-stop service.

Mrs. BOGGS. Mr. Chairman, I am a great enthusiast of Dulles Airport, and helped in trying to bring it together when it was first opened a little prematurely back in the Kennedy administration. And I agree with you that it is a fine airport.

I must tell you, however, that the nonstop flight from Dulles to New Orleans that is in the afternoon only, is often delayed because it comes from Philadelphia. We sit at Dulles Airport, sometimes, for a very long time before we are able to take off. So I do think that, of course, shortening the amount of time between Dulles and Washington is a very salutary objective and I hope it will be accomplished, because it is a beautiful facility that should be used. But you still have not only the longer length of time, but much more expensive surface transportation. And you not only spend more time, but you spend more money. It is a very difficult thing to accomplish.

Mr. ANDERSON. Thank you.

Mr. SNYDER?

Mr. SNYDER. Thank you, and I welcome my colleague from Louisiana here, and appreciate your contribution.

The FAA proposal is twofold. One is to increase the perimeter to 1,000 miles; the other is to reduce the number of air carrier slots per hour into National from 40 to 36, that is, reducing it by 4 per hour, which would be considerable during the course of the day. You did not address that; do you have a feeling about that?

Mrs. BOGGS. Yes, I do, and I addressed it sort of peripherally when I said if everybody who flew between Washington and New Orleans and New Orleans and Washington would take the nonstop flight, that it would only mean 1.6 flights a day. And I think that certainly, the marketplace could accommodate the reduction of flights per hour, and still be able to bring nonstop flights from New Orleans to Washington.

Mr. SNYDER. Now, if we lose four slots per hour under that proposal, then in addition, we bring in nonstop flights from the area between the 650-mile radius now and the 1,000 that is proposed which you endorse, those also will be subtracted from existing flights in and out of National. What impact do you think that will have on the service to the communities now receiving service from 650 miles and less?

Mrs. BOGGS. Well, I would assume that those who are receiving service would have to either go with larger planes, or that they would be cut out of some of the service that they are now receiving.

Mr. SNYDER. Well, larger planes will not give us anymore trips. We are going to have to lose 4 per hour in the first part of the proposal, plus we will also have to lose for people now being served whatever number comes from the 650 to the 1,000, and we will diminish that service considerably.

I understand your problem, and I am just delighted that my constituency is within the 650 miles, and will confess to you that I am as parochial as you are.

Mrs. BOGGS. But Mr. Snyder, I would assume also that these flights, for instance, from New Orleans to Atlanta or to one of the other intermediate cities that connect to Washington would also be decreased with the decrease in the number of flights. So that that would not really impact just on those within the 650-mile radius. It would impact on those who connect up to those flights, as well, and makes it even more necessary for us to have a direct flight.

Mr. SNYDER. Well, in view of the fact the second bells have rung, I will not pursue it, but I think you understand my problem.

Mrs. BOGGS. Yes; I do understand your problem.

Mr. SNYDER. Thank you very much.

Mr. ANDERSON. In the interest of the bells, I think we had better leave and go vote, and recess at this time.

Thank you very much, Lindy, for your presentation.

Mrs. BOGGS. Thank you very much.

Mr. ANDERSON. We stand in recess for about 10 minutes.

[Short recess.]

Mr. ANDERSON. The subcommittee will come to order.

I think just to show solidarity, I will invite all five Florida representatives up at the same time.

Claude, it seems to be the unanimous consent that you act as sort of a spokesman. We are very happy to have the distinguished Florida delegation here, Mr. Stack, Mr. Fuqua, Mr. Gibbons, Mr. Nelson, and Mr. Pepper.

We will make all of your statements a part of the record at this point, and you may proceed as you wish.

[The following were received for the record:]

PREPARED STATEMENT OF HON. CLAUDE PEPPER

Mr. Chairman and other distinguished members of the committee, I will not take up your time repeating the technical arguments that you have heard in regard to the proposed rule-making by the FAA. We are dealing with two issues here and I would briefly like to bring them to your attention.

One is an environmental issue, that is, whether the FAA proposal which would reduce scheduled daily air carrier operations by almost 20 percent would make the airport that much quieter. Unfortunately, the answer is—not really. What would accomplish this is what Congress has already done—the passage of legislation that encourages and mandates the building of quieter jet engines. The irony here is that the use of the two- and three-engine wide bodies which are the quietest planes available today are not presently permitted to fly into National Airport. That type of prudent move seems to be held hostage by the FAA as enticement to the passage of this rule.

The second issue that I would like to bring forward is the Airline Deregulation Act of 1978 and the intent of Congress in passing it. It seems that one agency, that is, the FAA is picking up where another left off, that is, the CAB. Forcing airlines to fly to Baltimore-Washington International and Dulles, airports that are totally inconvenient, sets an artificial setting that does not belong. These airports must stand and fall on their own merits. Artificial barriers such as this proposal negates the whole idea of airline deregulation.

Finally, and perhaps of most importance, I take offense that Floridians must be so adversely affected by a rule that has nothing to do whatsoever with safety. There are more than 45 daily flights between National Airport and Florida providing service for over one million passengers per year. To arbitrarily rule that such service must be halted negates the idea of Washington National Airport being a truly national airport. Ever since jet aircraft started using National Airport in 1966, there has, it seems, been something in the "wings" to curtail that service. I truly hope that today's hearings bring such movements to an end once and for all.

PREPARED STATEMENT OF HON. EDWARD J. STACK

Mr. Chairman and members of the subcommittee, I appreciate the opportunity to join my colleagues in opposing the proposal by the FAA to reduce the number of airline operations for air carriers at national airport. I have looked into this matter, and feel that service to my district, which is Fort Lauderdale, Florida and its environs, as well as other cities in Florida, would be adversely affected. Presently, there are seven (7) one-stop flights daily between Washington National and Fort Lauderdale Airport, which have carried 80,000 passengers during the 12 months ending September 30, 1979. Mr. Chairman, Florida's cities now receive a significant level of service from National Airport and while specific service reductions cannot now be pin-pointed, if the FAA plan is implemented, some adverse impact will obviously be unavoidable, given the almost 20 percent reduction in access.

I feel that the airlines serving National Airport have tried to do their share to minimize any adverse affects due to National's location. Over the years, the airlines have significantly reduced the number of flight operations, while increasing the number of passengers carried, furthermore, the carriers have made special efforts to reduce noise, through utilization of newer and quieter aircraft, and, special noise abatement procedures.

Rather than needlessly penalizing the air traveler who relies on scheduled air carriers for convenient service to and from Washington D.C., I would recommend that the reduction in operations at National be imposed at the time people in the affected areas are most likely to be at home; to wit, early morning, late evening and weekends.

I appreciate this opportunity to address the subcommittee.

TESTIMONY OF A PANEL OF CONGRESSMEN FROM THE STATE OF FLORIDA: HON. CLAUDE PEPPER, HON. SAM GIBBONS, HON. DON FUQUA, HON. EDWARD J. STACK, AND HON. BILL NELSON

Mr. PEPPER. Mr. Chairman and members of the committee, I thank my colleagues for giving me the privilege of beginning. Obviously, it is in recognition of the biblical injunction, that, "A little child shall lead them." [Laughter.]

Mr. Chairman, my speech can be very short, and I have filed my statement previously.

My thesis is a very simple one. The inconvenience or discomfort caused by the noise that the people in the proximity of National Airport experience is not in any way at all comparable to the inconvenience and to the extra effort and expense that would be involved to the people who use that airport going to and from our area of the State, to Florida, to justify the change that is proposed here.

As it is now, there are 45 flights a day between Miami and Washington. Now, if we had to go out to Dulles, you should allow 45 minutes to drive out there, whereas in driving out to the airport, it is between 10 and 15 minutes. I can leave my office a half hour before the departure of my plane and be out at National Airport and make my flight. If I had to go out to Dulles, it would double or more than double the length of time I would have to spend every day, getting to and from the airport.

And for the people who are our constituents coming up here from Florida, it now is such that they can come up on an early plane, say, from Miami or from Tampa or the other cities in the State, and have practically all day here to devote to the public business they want to attend to, and get back on a late evening plane, after 5 or after 6. That gives them nearly a full day to spend here in the Nation's Capital, attending to their public business. If they had to go out to Dulles, they would probably have to spend 2

days here in order to attend to the public business they would otherwise attend to in 1 day.

Mr. Gibbons was pointing out a moment ago, I think, that the taxi fare from Dulles into Washington is something like \$20, I believe, which would be rather a burdensome expense to a good many people.

I do not believe that the noise at National Airport is as great as the noise in Miami, into National Airport as into my District. People are living there. They complain about it a little. But after all, you have to take into account a balance of the interest involved.

Now, if they bring in more of the wide-bodied planes into National—now, I do not know whether safety enters into it or not—but those are less noisy planes than the ones I understand come in there now. But even if the noise is not to be diminished, there is not a safety factor involved in this proposed change. It is just noise. And after all, people are there, but if they cannot stand the noise, the public interest simply requires that there be a lot of planes coming in there. It is just like there is a lot of traffic on the highways. I do not know any way to get everybody else off. I would be glad if a lot of people would stay home when I want to drive on the streets or the highways, but they have a right to be there, too. So it just seems to me it is a part of what we call in commercial parlance, "part of the cost of doing business." It is part of the characteristics of living in a busy city.

So I am here to protest strenuously against changing the regulations now so as to deny people situated as we are access to use of National Airport.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Pepper.

Mr. Gibbons?

Mr. GIBBONS. Thank you, Mr. Chairman. I appreciate your allowing me to come here today and testify on this subject.

What I have to say is not going to be real pleasant, but I feel very strongly about it. When Washington, D.C. was put here, it was put here to be the Nation's Capital. It was put here to serve the Nation, not to serve the people who are inhabitants of the community. If the people of Washington, D.C. do not like the noise of Washington National Airport, they can move out.

My constituents have a higher priority to be able to come to this Capital and come here conveniently than do the lobbyists and the merchants and the other people who live around here because the Capital is here.

Now, I have two airports in my city limits. They are noisy airports; one of them is far noisier than the Washington National Airport, and my constituents used to come to me and complain about the noise of the airport. I told them, "You know, the airport was here before you probably moved here. You bought your home and moved in knowing the airport was there, and if you cannot stand the noise, then you sell your home and move someplace else." Very few of them ever sold their homes. They all still live there, but they do not gripe anymore.

Now, when I say they are noisier than Washington National Airport, in my airport that is within the corporate limits of the city

of Tampa, it has F-4's that are launched day and night, all night long, sometimes for night training. And an F-4 makes a DC-9 or a 727 sound as quiet as a Cadillac. F-4's are probably the noisiest airplanes that have ever been built and they take off all the time. And my constituents do not come and gripe and cry and complain as the Washington area people do.

Now, I say very clearly, if the people around the Washington vicinity cannot stand the noise of National Airport, let them go someplace else. Washington was put here to serve my constituency, and I believe it ought to. I do not think my people ought to have to throw away another half day by being diverted out and having to pay the extra cost of having to go out to Dulles. And I feel very strongly about this. I wish the FAA would quit pampering and catering to the people who come up here and cry and complain all the time.

Thank you, Mr. Chairman.

Mr. HAGEDORN. Mr. Chairman?

Mr. ANDERSON. Mr. Hagedorn.

Mr. HAGEDORN. Mr. Chairman, I want to thank the gentleman for one of the more candid statements we have had before this committee in some time. I think you speak from the heart, and you really express yourself appropriately, that this Capital is here to serve the American people, those people who want to come here and visit with their legislators and their friends and lobby the Government, as their right is, and to have good, available access to the Nation's Capital is important.

Mr. Chairman, I ask unanimous consent to insert a statement in the record at this point.

Mr. ANDERSON. No objection, so ordered.

[The following was received for the record:]

PREPARED STATEMENT OF REPRESENTATIVE HAGEDORN

Mr. Chairman, I want to join my distinguished colleagues who have taken the time this morning to appear before our subcommittee to express their concerns about the proposed Department of Transportation policy for Washington National Airport. I also want to voice my displeasure with these changes which would reduce service in and out of National Airport.

Earlier this year, the DOT published proposed regulations concerning the future use of National Airport which would not only reduce the number of flights into the airport per hour, but also the total number of hours operation. The stated purpose of the DOT action is to reduce the noise levels in the approach and departure corridors to National and to limit the number of passengers served at that facility in order to stimulate growth at Dulles and Baltimore-Washington International airports. I believe, Mr. Chairman, that the imposition of these restraints will have a negative impact on public service to and from Washington and, therefore, should be opposed.

The DOT proposal would reduce the number of scheduled airline operations at National by over 18 percent and would impact more than 5,000 passengers per day. Service to 107 cities in 43 states which currently have direct scheduled service to and from Washington National could be affected. In addition, the proposal would preclude service being expanded to other cities which require convenient access to Washington.

The DOT and the FAA and others who support the proposed rule argue that service to Washington will not be reduced, but only shifted to the Baltimore or Washington airports. This argument is a fallacy. If an airline is operating a profitable route into National Airport and that service is required to be diverted to Baltimore or Dulles, it is doubtful that the full passenger load would follow that carrier. Some passengers would choose a Baltimore carrier, some a Dulles carrier, and others a connecting flight so they could still reach Washington National. Thus,

a carrier's traffic could be diminished to the extent that it may be in the best interest of that carrier to terminate service all together.

For these reasons, Mr. Chairman, I oppose the proposed regulations and urge my colleagues to co-sponsor a resolution to be introduced by the gentlewoman from Tennessee, Mrs. Bouquard, which would express the sense of the House that DOT should not take any action which would reduce public air service into Washington National. It is my understanding that approximately 70 Members of Congress have agreed to co-sponsor this resolution and I would encourage my colleagues who have not signed on to do so in order to prevent a decline in needed air service to and from Washington National Airport.

Mr. GIBBONS. Mr. Chairman, I am going to speak for Bill Nelson, now, and I do not ask him to endorse my views, but he wanted to be put on record that he supports not changing the access of his constituents from the Orlando area and the Melbourne area of Florida into Washington National Airport.

Mr. Nelson is over on the House floor presently, working to help bring up the budget resolution.

Mr. PEPPER. Excuse me, Mr. Chairman. I would say the same thing for our colleague, Mr. Lehman. He left his statement to go in the record. He shares our conviction about this matter. He uses the Miami airports.

Mr. ANDERSON. Mr. Lehman's statement is here at the desk and will be made a matter of the record. No objection; so ordered.
[The following were received for the record:]

PREPARED STATEMENT OF HON. WILLIAM LEHMAN

Mr. Chairman, I appreciate this opportunity to inform the subcommittee of Florida's concern regarding the Federal Aviation Administration's proposed restrictions on traffic at Washington National Airport.

Today Florida's cities, and especially Miami, benefit from the frequent service to and from National Airport. As of June 1, 1980, there were nine nonstop flights and three one-stop flights serving the Miami-Washington National route on a daily basis. Over a twelve month period ending September 30, 1979, nearly a half million passengers traveled between Miami and National Airport. In addition to Miamians, residents of eight other Florida cities have been able to enjoy the convenience of flying into National.

The proposed 18.5 percent reduction in access to the airport will obviously have a significant impact on our Florida traffic. Following the enactment of legislation to deregulate the airline industry, several airlines chose to enter the Florida market. These were responsible business decisions based on what that market can bear. Eliminating some of these flights will only negate the deregulation benefits consumers have gained.

Air Florida, formerly an intrastate airline, provides an excellent example of a deregulation success story. It has done extremely well in this new environment and its flights between Washington and Florida have played an important role in its development as a national and international competitor.

Air Florida was originally allowed only to fly into Dulles International Airport. It fought hard to gain permission to fly into National because of the obvious advantages of the more convenient location. The prospect of some of its flights now being forced back to Dulles understandably disturbs the airline and its passengers as well.

I should also note that the veterans on these routes, such as Eastern Airlines, have also expressed to me their displeasure with the proposed rules. Both Eastern and Air Florida have endorsed the comments which the Air Transport Association submitted to the FAA.

I will not minimize my own interest in taking advantage of the proximity of Washington National Airport to the city of Washington and to Capitol Hill in particular. There are thousands of other Floridians, however, who have come to depend on frequent and convenient flights to Washington. I recently received a copy of a letter which the Mayor of Dade County sent to you, Mr. Chairman. The mayor, the honorable Stephen P. Clark, noted that "[c]ountless Florida business people and Government representatives from our cities and counties are able to conduct business in Washington in a single day—as opposed to two or three days—because of the convenience of National Airport."

Mr. Chairman, you know of my strong support for your legislative efforts to reduce the amount of noise that airport neighbors must endure. We have already made good progress in noise reduction by requiring airlines to invest in quieter aircraft. I believe that there are other alternatives to the proposals made by the FAA to lessen the amount of noise due to flights in and out of National Airport. We should not risk the disruption of our air transport system nor undo the good which deregulation has allowed airlines to achieve.

Mr. ANDERSON. Mr. Fuqua?

Mr. FUQUA. Thank you, Mr. Chairman. I appreciate the opportunity to be here with my fellow members of the Florida delegation.

Mr. Chairman, I submitted a statement for the record, but I would like to ask unanimous consent that it not be submitted, because I do not feel it is quite strong enough.

I, too, want to join with my colleagues from Florida in registering a serious protest about the FAA, and about the 6-year cycle, I believe, that they come back with new plans to reduce or change or modify or eliminate service at National Airport. I think this is about the third or fourth time in the 18 years that I have been in Congress that we have had some similar hearing or statements from the FAA about this process. I guess they feel they can make things more their own way once a number of Members have rotated or have left Congress for various reasons.

Their latest proposal is to reduce, as I understand it, about 118 slots coming in and out of National Airport, and they complain about the noise—and Mr. Chairman, you know we had a bill that came out of this subcommittee last year that we passed that had a certain amount of retrofit for aircraft, and we are making aircraft now, and the new generation that will follow the DC-9's and the 727's will be a much quieter aircraft, in addition to the wide bodies they are talking about.

I have three cities that primarily people come to and from Washington for business—Tallahassee, the capital of Florida; Gainesville, and Jacksonville. From Gainesville and Tallahassee, you must come through Atlanta; that takes an hour or longer for change in Atlanta. It would be nice if traffic and the market permitted for those cities to have nonstop service to Washington, or at least be available to have that. I am not sure at this time that it would be feasible, but there may be some intermediate stop that would avoid the Atlanta connection.

And the point that Mr. Gibbons made, I want to just elaborate on. At the present time, people doing business for my district in Washington can now leave at about 7 in the morning and arrive here just prior to 11. It is possible for them, then, to catch a late afternoon plane, after 5, to return home by 9 at night. Attorneys, engineers, people doing business with the Government or private enterprise, or whatever their mission may be, can spend around 6 working hours in the Nation's Capital. And it has been pointed out that that is what the Capital was put here for, for people to have access in and out. As Mr. Pepper mentioned, it is about a \$20 cab fee or higher to come to and from Dulles Airport. And the time involved—it would require probably an overnight stay for many individuals, at expense to the people that they are representing or their own expense, depending on what their mission was.

So I would urge this committee to take whatever steps are necessary to get the message to the Federal Aviation Administration

that this airport needs to be left as it is so that there can be easy access to it for the people, particularly in the Eastern part of the United States.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Fuqua, for an excellent statement.

I am getting a message here this morning that kind of bothers me, that you people have to have this quick service to get a good representation, and I keep thinking about my constituents way out in Los Angeles. We are not doing very good, and I just said to Gene here that maybe we ought to move the Capital farther west, like to Louisville, or someplace like that—

Mr. GIBBONS. Well, your people could move to Florida, Mr. Chairman. We would be glad to have them. [Laughter.]

Mr. SNYDER. I just want to interpose that I am not sure I would want to move it to Louisville. I still like the fact that for most of us who serve in the Congress, our constituents have to waste a long-distance call to get ahold of us; if it were a local call, it would be a lot worse. [Laughter.]

Mr. ANDERSON. Mr. Stack?

Mr. STACK. Mr. Chairman, I appreciate the opportunity to be here this morning and to associate myself with the statements of my distinguished colleagues from Florida.

I represent the area of Florida, the principal city of which is Fort Lauderdale, and of course, the environs surrounding that city.

We have a total of seven one-stop flights a day into National. The people in my area would be very seriously and adversely affected by the proposed reduction in service. I do not know that I could possibly say any more strongly what has already been said, and to do so would be repetitious.

I again thank you for being here, and I have a statement for the record which I would like to insert therein, and associate myself with the remarks of my friends from Florida.

Thank you, sir.

Mr. ANDERSON. Thank you

Mr. GIBBONS. Mr. Chairman, I have one more thing that is not repetition and was not brought up. I live probably closer to this Washington National Airport than any of the people who constantly come up here and bellyache about the airport. I live right off the end of the north-south runway; I live in southwest Washington. 727's and DC-9's and other airplanes fly right over my apartment many, many times. I hear every plane that takes off and lands at Washington National Airport. I am just as sensitive to noise as anybody else is, I guess. I can put up with it. I think these other people can put up with it. And I am sick and tired of hearing them bellyache and cry and complain about it, and I am sure I will probably get some nasty letters about this, but you know where I am going to file them. [Laughter.]

Mr. ANDERSON. Let me kind of get the Florida recommendations here.

[Laughter.]

Now, we have this 650-mile perimeter that precludes anyone outside of that from being able to have the nonstop into the Capital, with the exception of the cities in Florida that were exempted

or "grandfathered"—Orlando, Tampa, West Palm Beach, and Miami; Fort Lauderdale is not in there.

Now, we have a dual recommendation in here. We have the FAA recommending that we cut down on the number of stops from Washington National from 626, I believe, to 480, by 1990. We have heard others say four an hour. They are talking about cutting down the number of landings, and at the same time, the possibility of extending the nonstop out to 1,000 miles. Well, if you extend it out to 1,000 miles and pick up other cities like New Orleans, or even if you do not do that, even if you just cut back those four an hour, somebody who is already getting nonstop service has got to lose some stops.

Now, how is that going to affect those of you—three of you do represent cities that are "grandfathered" in; one of you represent a city that is not "grandfathered" in. Now, I am not clear what Florida's position is on this. Are you in favor of cutting down from 626 to 480; are you recommending we keep it at the same number that are coming in; are you recommending we hold the perimeter of 650 miles, with the present grandfathered cities grandfathered in, or are you suggesting we go out to 1,000 miles and pick up those cities that are in the 1,000-mile perimeter? I am not exactly sure what it is that you are telling us.

Mr. GIBBONS. Mr. Chairman, I do not want any special treatment. I do not want any special treatment for my folks, and I do not want any extra special treatment for the folks in Virginia and Maryland and the District of Columbia—

Mr. ANDERSON. Well, Sam, you are getting special treatment—

Mr. GIBBONS. I said I am not here to beg for that. But I do not think that you ought to limit the number of flights into Washington National Airport.

I am not here to beg for any special treatment. I do not ask to be treated any better or any worse. But I do not think you ought to give extra special treatment to the people who live in some proximity to Washington National Airport so that they are somehow disturbed by the noise that is there. That is the only thing I am asking for.

Mr. ANDERSON. Well, do you want to eliminate that perimeter rule, then, entirely?

Mr. GIBBONS. No, sir, I do not want to eliminate it, but I am not here to beg for it.

Mr. PEPPER. Mr. Chairman, I would like to add a word about this. All that is involved here is noise. It is not safety; I have not heard anything about safety being involved in it. It is noise.

Now, let us just take one balance of interests, because as I said, I think you have to balance interests in respect to this matter. This is a time when we are trying to conserve gasoline. If everybody who now goes to National is going to have to go to Dulles, I believe it is 5 minutes to National, and how far is it to Dulles—they tell me it is 27 miles to Dulles. Now, that is over five times the distance that somebody has got to go, generally, in an automobile. So if you are going to include the advantages and disadvantages, let us include gasoline consumption in all those vehicles that have to go five times as far, ordinarily, if they go to Dulles.

The other thing is, it would be up to the FAA—I do not see any reason why we should substantially change the present system. If they think more people can be included in the privilege of going to National, and nobody is affected except those who are hurt by noise, well, then, do it. I would put in as many people as can be permitted to go there with safety, and if you can add a few more without impairing safety, not worrying about the noise, then I would do that. That seems to me to be a rational principle to be applied in the matter.

Mr. ANDERSON. Mr. Fuqua?

Mr. FUQUA. Mr. Chairman, if I might just add my own 2 cents worth—and not trying to speak for my colleagues, but for myself—I think I am more concerned about the effort of the FAA to reduce the number of slots. If they want to extend certain flights to 1,000 miles, I have no real problem with that. But I am concerned about the reduction in the number of flights coming in and out of National, and I think by and large, that is basically what our concern is.

Mr. ANDERSON. But if they do extend the perimeter, then they obviously would have to reduce some, because already we are pretty crowded.

Mr. FUQUA. Well, they are talking about the wide bodies, but there are many intermediate communities that a wide body would not be an economical flight to and fro. So still, there may be some mix between the current aircraft that are coming in and out and wide bodies. I realize that yesterday, you had some safety questions that were raised, which I cannot speak to. But I would not want to totally eliminate all the smaller-size or medium-size jets that we have today that come in and out of Washington National.

Mr. GIBBONS. Mr. Chairman, if they really want to reduce the air traffic congestion there, which they are apparently trying to do with this childish reduction of the number of commercial flights in, they can get rid of all those private flights that come in there all the time.

You know, you go out to Washington National, and there are literally hundreds of private planes sitting on the aprons out there, and they are taking off and landing. As I say, I live closer to the airport than most of the people do who gripe, and I know the kind of traffic that comes in and out of that airport better than anybody except perhaps the people who keep the records out there, because I can see it and hear it from where I live. And if they want to really reduce the amount of traffic in there—and the private planes take up just about as much air space as do the commercial airliners; not quite as much, but just about as much air space as the commercial liners, and certainly serve far fewer people—then they can take some of that private flying out of Washington National and put it out here, over in Dulles or in Baltimore or wherever they want to put it. You know, sometimes these big private jets land out there, and one or two people will get out of them, where you land a DC-9 or a 727, and 100 or 125 people will get out of them. If they are worried about air space, they have got a solution to it. They can get their own airplanes out of there. They can get those semipublic planes out of there that are leased to the Pentagon and to everybody else who leases them around there, and they can just get the ordinary, private jet out of there and some of

the smaller planes out. They take up the air space. That is what is causing the air congestion there at Washington National.

Mr. ANDERSON. Yesterday, we heard testimony that under present policy for National—we are talking about curfew now—the airlines schedule about 18 flights at 5:59 p.m., and that it takes until 10:30 or later for these flights to be completed, and that this is a source of substantial annoyance to the residents near the airport.

The FAA now proposes to allow no operations after 9:30 and to permit only 18 operations between 9 and 9:30. I would appreciate your comments on this proposal.

Mr. GIBBONS. My constituents have to endure, and they do it, and they do not gripe. F-4's operating all night long—an F-4 makes a 727 or a DC-9 sound as quiet as a Cadillac. Really, there is no comparison in the number of decibels that an F-4 will emit, compared to a 727 or a DC-9, and those are the noisiest of the planes that use Washington National.

I think that we are just pandering to a bunch of spoiled brats, Mr. Chairman. The District of Columbia is here to serve the Nation. The people who are here were brought here to work in Government or to lobby or to support Government. And if the people who came here for that purpose do not like it, let them move someplace else.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you, Mr. Chairman. I do not want to say anything that would in any way diminish the comments that have been made. I have been sitting here beside you for a good many years, and I have come to share Mr. Gibbons' sympathy for those who move in around an airport and then complain.

As I observed yesterday, I came here some 16 years ago, I guess a little bit after you did, Sam, or thereabouts, and originally bought a house out in Annandale, and then Baileys Crossroads, and now I live here on the Hill. And I have watched the development around that airport, and I have observed that the same house as you get nearer the airport costs you about \$2,000 per mile getting closer to the airport. And it is a convenience of where they live, and they have got to offset that against the noise.

I have no particular questions, Mr. Chairman. I share the general observation of the Florida delegation, that we ought to leave things sort of like they are. I do not see any need to decrease the number of slots by 18.6 percent, which is what we are talking about when we take four out an hour and then take the curfew off the end, too. That is almost a 20-percent reduction of the air carrier slots going into National.

I appreciate very much the candor with which all of you have presented your statements, as well.

Mr. PEPPER. I would like to answer in the negative, Mr. Chairman, the question that you last put. I think that is too soon a curfew. After all, the right of movement has been held by the Supreme Court to be one of the essential rights of an American.

Remember that those people who are moving up and down ordinarily have some legitimate reason to spend their money to be up, making that trip. Now to say they cannot make this trip today because they cannot get away by an early hour, say from New

York or some other place, is to deny those people, I think, what is a legitimate right, and the only reason you are denying it is because it is getting a little late in the evening, and the people in the vicinity might be disturbed a little bit about going to sleep.

Well, my observation is, I used to live in Coral Gables, Fla., right under the flight of the planes going to and fro. If we were sitting out around the pool, why, the planes flew right over. Well, nobody sent their glasses back, and nobody went home because the planes were going over, and after I got inside the house at night, I did not pay any attention to them. And I think anybody who is accustomed to living out there is not going to be bothered by the planes flying; let them get accustomed to them and go on and go to sleep, and let the people have a legitimate access.

Mr. NELSON. Mr. Chairman, I want, if I might, just to make one comment as to your opening comments when Lindy Boggs was testifying, as to your less-than-desirable experience with National Airport.

My experience has been quite to the contrary—easy accessibility. I can make it in 6 minutes. And if a plane is set to go, and I am tied up until 10 minutes before that plane closes its doors, generally I can usually make it. I try not to push it that much, but if I am tied up on a vote or what not.

And just picking up on my colleagues' comment, this is the airport serving our Nation's Capital, located in an extremely convenient place for people to enter and exit from this Nation's Capital, and I would urge that you keep its availability.

Mr. GIBBONS. Mr. Chairman, I want to make even another suggestion. I think this committee ought to improve Washington National Airport. That terminal building out there is a disgrace to the Nation. It is dirty, it is ill kept. The traffic congestion is a disgrace to any modern traffic planning. I think it ought to be improved so that at least you would not have to apologize for it to your own constituents.

That and Dulles are the only civilian airports that are owned and operated by the Government, and I think it is a disgrace that the Washington National Airport has been allowed to get in such lousy condition.

Mr. ANDERSON. Mr. Levitas?

Mr. LEVITAS. Thank you, Mr. Chairman, and I express my appreciation to our colleagues for their very candid and helpful and forthright statements.

The fact that so many of you are here demonstrates your interest not individually, but on behalf of your constituents, and I commend you for it.

I cannot let Mr. Fuqua's comment go without some observation. We would like you to come through Atlanta and hope you will do it more often—

Mr. FUQUA. And I always see my good friend there, too, when I come through.

Mr. LEVITAS. We always come up together. Starting in the fall of this year, you will be using that great, new facility there, which will be the world's largest airport, and it will be one, I think, that will make us all proud and make our traveling public more conveniently served.

Let me ask this question, because I see a certain inconsistency in the Administration on this whole issue. One of the functions of this proposal that FAA is making is to, in effect, force traffic out to Dulles and force the airlines to use Dulles or BWI, as a result of a governmental decision rather than a decision of the airlines and their passengers.

Now, if I remember correctly, this was the same Department of Transportation that urged strongly upon this Congress the enactment of the airline deregulation legislation in order to stop having Government make those decisions and let the marketplace make those decisions. Am I seeing something—

Mr. SNYDER. Is this the first inconsistency you have observed in this Administration?

Mr. LEVITAS. It is a good example. I remember having some differences with them over that before. [Laughter.]

Mr. FUQUA. I think we have had some other deregulation bills through this committee, too.

Mr. LEVITAS. We have handled one or two, and it just seems to me that is inconsistent.

The other thing is—and Mr. Gibbons, you know this, because the bill was referred sequentially to the Ways and Means Committee—the ADAP bill that this committee just recently reported out specifically deals with the question of access and slotting, and for the first time in history, there will be a major conference convened of all the participants to come to some resolution.

Do you think it is appropriate for FAA to make a judgment and decision on this even before that conference is convened?

Mr. GIBBONS. Mr. Levitas, all the FAA is doing is pandering to a bunch of babies who come up here and cry about a little noise. That is all they are doing. Let us take all the garbage off of it. That is all they are doing. I have been here longer than most of the people in the FAA have been here, and I think I have been in Government long enough to understand something of what they are really up to.

Mr. NELSON. Would the gentleman yield?

Mr. GIBBONS. Surely.

Mr. NELSON. Mr. Chairman, with your permission, won't this problem really work itself out when you have the retrofit on the engines, and you have the quieter engines come in in a couple of years? Won't that problem really adjust itself?

Mr. FUQUA. It is already adjusting itself.

Mr. ANDERSON. It will not reduce the number of slots. There is a limit now—and I suppose we can all argue as to where the limit is—but I suppose every one of us might have a different number. When we reach whatever that limit is, somehow there has to be a limitation.

Now, the question we are asking is who should put this limit on. Should it be the airlines; should it be the Government; should there be a perimeter; should we eliminate the 650-mile perimeter and let them fly into Los Angeles or wherever they want to make the decision? I think these are the things that we are looking for your ideas on.

Mr. GIBBONS. Mr. Chairman, the FAA is going to eventually have to face this slot thing and do something about it. It is ridiculous to

let every airline arrive at the airport at the same time, or try to take off at the same time. They would much rather, instead of exercise a little mental power on this, inconvenience all the people who have to use it. But you cannot land and take off every airplane at the same time. They just have not ever faced up to that problem, and they are going to have to impose some traffic control rules that will do that. And you cannot let these private planes come bursting into the air scene anytime they want to. They take up just about as much air space, as far as safety is concerned, as a commercial airliner with 125 or 200 or 400 people on it.

Mr. PEPPER. Mr. Chairman, may I ask, is it considerations of safety, or considerations of noise, which have primarily influenced the FAA in fixing the limit that they now observe?

Mr. ANDERSON. We have had testimony also of the danger, that there is a limit to the number of flights that can go in and out. There is also the problem of the wide-bodies, that they do create a wake vortex, and there has to be more time and more space between them. ALPA was saying yesterday there must be at least 5 minutes after a big wide-body lands before another plane can come in, due to the vortex problem that does not exist with the smaller planes. So there are some safety issues involved.

Mr. PEPPER. Well, of course considerations of safety will always have to come first. But I had understood that the basis of this FAA proposal now is not safety but noise, and I simply submit that in view of the prospective inconvenience it would cause, and added expense in money and gasoline, that that is not a justifiable request.

Mr. FUQUA. Mr. Chairman, if I might add, I think we are all well aware that noise is a primary consideration. They felt that they could bring the quieter, wide-body jets in, and they could reduce the number of flights and please both sides.

Well, it is not working that way. What the situation is is that we will have with retrofits quieter present jets; the new generation that is coming on the line will be much quieter than even the wide-bodies. And we are all well aware that there is a safety limit on the number of slots that can come and go in and out of that airport, because they only have one primary landing runway.

We are not asking to make the flights unsafe. I treasure my life and my family's life more than that, and so do all the people who fly. I would not advocate that, and I do not think anybody is. We are not trying to say how many can come and go. They have been operating at the number of slots rather safely for the last number of years, and I think what we are saying is that they can still do that with the number of slots. Whether there are wide-bodies, they maybe can be, as I mentioned earlier, sandwiched in, coming from certain strategic locations if the market would supply—I am not capable of answering that question. But my main concern is that there be adequate access in and out of Washington National Airport for the traveling public that come and go from our Nation's Capital.

Mr. ANDERSON. Mr. Fary?

Mr. FARY. Thank you very much, Mr. Chairman.

I am with you, Mr. Gibbons. Getting back to what you said, I live across the street from the church. I have been there for 5 years

now, and the church bell rings every morning at 7 o'clock, and I have gotten to a point where I do not hear it anymore. And yet, Geraldine Ferraro, on our committee here, moved recently within a mile, I would say, and the bells annoy the hell out of her. So she is going to have to live there a little bit longer to acclimate herself to it, I guess.

But I would go a little bit further, one step further. An annoying thing to me is to get to O'Hare Airport, and there is a mile of people up ahead waiting to be "frisked" by the security equipment. I personally feel that as Congressmen, we would be the least to sabotage our country, and I think we should be given the privilege of showing our identification card to the security officer and being able to bypass all those other people who are being searched and frisked for the keys, metals, and so on.

Now, to give you an example, my hobby for years has been collecting old badges and stars and so on. And we had a little old pub in the old neighborhood, and one day I said to one of the guys, "I want you to come to the airport with me, and I am going to give you one of these old badges"—and this badge, the particular department was the coroner's office; it has been abolished—"and I want you to go through the security line where the employees show their I.D. and go through the policy, and I want you to show them that badge and say you are waiting a Congressman." He said all right. So we went over, and it took me a good 15, 20 minutes before I got through the line, waiting for people to be searched, and with the mechanism running up and down.

Meanwhile, he was in there, waiting for me for about 20 minutes. All he did was flash the button and say, "I am waiting for a Congressman," and he got right through.

And personally, if you want to call it "clout," all right, let us use it, but I personally think we should be given that privilege. Imagine the time we would save. We travel light to begin with. We would not be tying up traffic at the airport. We would not be tying it up any other place, and we would be on the move and save a lot of time. That is my personal opinion there, Sam.

Thank you very much, Mr. Chairman.

Mr. ANDERSON. Mr. Mineta?

Mr. MINETA. Thank you, Mr. Chairman.

We are now up to roughly, at National alone, 15 million passengers a year and roughly 340,000 operations, take-offs and landings. There is only so much gate space and so much air space.

I am wondering from a noise liability perspective whether or not we would not be subjecting ourselves to noise suits. We have had, in California and other places, a number of lawsuits filed, and payments have been made. There is an important case of Westchester versus the city of Los Angeles. I am wondering whether or not there is a noise liability issue here that we are going to have to face up to.

Mr. GIBBONS. Mr. Mineta, if we get sued, we ought to take the case all the way up. I do not think anybody can prove that the value of their real estate has been depreciated because of that. I do not think anybody can really prove that their health has been adversely affected by that.

Mr. MINETA. Well, we have had cases on that.

Mr. GIBBONS. Well, I know we have had cases on that, and we have had cases that were won and cases that were lost. But I have constituents that live right under the ends of runways where F-4 jets, Phantom jets, operate day and night, 7 days a week, on training flights, and they take them off full bore. And they not only take off one plane at a time, they take them off in V's, flying that way, one V after another. They take off three planes at a time. You have got three F-4's, wingtip to wingtip, right over your house, either taking off or landing. And some of those families have lived there 100 years. They do not complain about the flights.

But these people around Washington complain about everything, Mr. Mineta. And some people are just used to being babied and towed to, and others have got some stamina.

I am a light sleeper. I live closer than most of the people who complain all the time around here. No airplane has ever kept me awake at night. There are a lot of other things that have kept me awake at night, but not airplanes. And I think it is a bunch of garbage that the FAA keeps dragging up here. What they are trying to do is—for a long time, they tried to make Dulles economically feasible by forcing people to go out there. And finally, somehow it got on its feet and started to almost break even, and the Maryland delegation has tried to force people to go out to that airport that they built in the wrong place, out around Baltimore. And that is all it was. Members of this committee who were from the Baltimore area, with whom I used to chat informally, would say, "We are trying to get some business for our airport." Well, I do not know why we ought to make our constituents do that. I think it ought to stand on its own feet.

Mr. MINETA. The reason I raised that question is because I was mayor of a community where we have the eighth-busiest airport in the country, in which in the past, diminution of property value was the basis for a lawsuit. And next to Los Angeles, we have paid the largest number of dollars out for diminution of property value.

Mr. GIBBONS. I bet you every one of those homes sold for more than it cost; no question about it.

Mr. MINETA. No question about it. But in the meantime, there is now a suit in which residents have been able to at least get a judgment, and it is now under appeal, for damage beyond diminution of real estate value. And it seems to me that that kind of potential still does exist and that we do have to look at. It is not a question of having to give in, but it is an issue, I think, that has to be looked at.

Mr. GIBBONS. I think we ought to fight every one of them and make them prove it. If they can really prove they have been damaged, then I do not mind compensating them, but I think most of it is imaginary.

Mr. MINETA. That is what the court cases are all about, and it seems to me that it is something we have to face up to. It is now under appeal before the Supreme Court, and it seems to me that we are going to have to face up to that.

You were active in trying to deal with that noise situation, and I know you have a sensitivity to it, as well. And the question is where do we draw that line as to what is a reasonable threshold of pain for people to acquiesce to?

Mr. GIBBONS. Well, we ought to, of course, try to quiet down all of our planes as much as they can be quieted down, without adversely affecting the safety of them, and obviously, planes like the F-4's, you cannot quiet them down. They are high-performance aircraft, and any pounds you add onto it are going to decrease its performance. And that is the reason why I use those, because I know there is no possibility of quieting those down.

So I really think that any plaintiff ought to be put to the full task of proving without any doubt that they really are being adversely affected. If they are being adversely affected and can prove they are being adversely affected, then we ought to do something about it. But I have never seen anybody lose a nickel in selling any piece of real estate that they owned that they claimed was adversely affected, and I have never seen a human being who came into my office who had really been adversely affected by the noise. Some people just come in and complain about anything.

Mr. MINETA. I would like to thank the panel for their time here, and thank you, Mr. Chairman.

Mr. ANDERSON. Mrs. Bouquard?

Mrs. BOUQUARD. Thank you very much, Mr. Chairman. I certainly appreciate my colleagues being here this morning.

In light of what you said, Sam, as a mother of four children with three grandchildren, I happen to know that you can turn noise on and off when you want to. If you are going to let it bother you, you can; if you do not want it to, you can turn it off.

I also lived over in Crystal City in the flight pattern for 2½ years, and I enjoyed sitting on my balcony, watching the planes, and I am getting ready to move over to your area. So I think that my feelings lean in the same direction as yours with regard to noise.

I think when we approach the issue of safety that we ought to have a balance of safety. I do not think it should be the safety out here anymore than the safety in Atlanta or your airport in Miami. OK. We are concerned about the quality of life on a national level.

If this proposal is enacted, and we increase the perimeter to 1,000 miles, and we bring in our wide bodies, then you know and I know that this is going to bring the large planes from the larger airports, that we will not have service from our medium hubs, and as a result, we are going to have to continue going into our larger airports, where we do have a safety factor that is real. It is frightening to go into the Atlanta airport. I know that Mr. Levitas is very proud of his airport, and he has every right to be, but I will let him share his glory all his own.

But I feel that you have made a great contribution, and I hope that we will not see an increase in the perimeter, as you have expressed.

Thank you all very much.

Mr. NELSON. Would the lady yield?

Mrs. BOUQUARD. I yield.

Mr. NELSON. This has not been brought up, but if you are concerned, Mrs. Bouquard and Mr. Chairman, with the increasing of the capacity of the airport, it would seem to me that the terminal capacity is one of the limiting factors right now in the availability of parking access and so forth.

Senator Pepper's aide just gave us some statistics that La Guardia Airport is handling 18 million per year because they have a terminal capacity of upstairs and downstairs, arrivals and departures. The location of the existing Metro system, out there where you have to walk across the parking lot to get to it, I would think is one of your limiting factors of trying to increase your use of that, of increasing your capacity of getting to the airport.

I would urge you all to look at the architectural plans for the future of building in the new terminal if you are concerned about capacity, as well as these other factors you are looking at.

Mrs. BOUQUARD. Thank you very much, Mr. Chairman.

Mr. ANDERSON. I want to thank the delegation for being here.

I think this is probably the proper time, also, to have the remarks of Senator Chiles from Florida inserted in the record.

We will stand in recess for 15 or 20 minutes.

[Short recess.]

[The following was received for the record:]

PREPARED STATEMENT OF SENATOR LAWTON CHILES

Mr. Chairman, I thank you for allowing me this opportunity to express my views on the proposal by the Federal Aviation Administration to curtail air carrier operations at the Washington National Airport. First, let me simply state that I am very much opposed to this plan. For over a decade, several major airports in the country, including Washington National, have been subject to artificial restrictions on aircraft operations. For the most part, these restraints have remained unchanged and have failed to take into account improvements that have been made in our Nation's airway system. Now, flying in the face of airline deregulation, the FAA is proposing to further restrict operations at National Airport. While I had my concerns about the wisdom of passing airline deregulation several years ago, I believe that the decision by the President and the Congress to do so mandates that such restrictive policies be abandoned and that the need for unrestricted access to and use of all our Nation's airports be emphasized. In short, by approving airline deregulation we agreed to let the marketplace settle the question of service to our airports, allowing some to suffer service reductions while others, like Washington National, flourish.

As a Senator from a State that has been greatly impacted by deregulation, I am firmly convinced that the FAA proposal would have a very adverse affect on existing air service between Florida and Washington, D.C. As you know, the FAA proposal calls for a reduction in scheduled hourly air carrier operations from 40 to 36 between the hours of 7 a.m. to 9 p.m. The number of flights between 9 p.m. and 9:30 p.m. would be limited to 18. After 10:30 p.m. the airport would be closed completely except in case of emergency. Obviously, this represents a significant reduction in the number of flights that would be allowed in the airport daily. Presently, the cities of Miami, Orlando, Tampa, Ft. Lauderdale, West Palm Beach and Jacksonville have service to Washington National with some 45 flights daily. Last year alone, these flights provided service to over one million passengers. Nationally, it's estimated that the elimination of over one hundred flights per day would displace 5,000 passengers and affect over 105 cities. Clearly, the FAA proposal to reduce air carrier flights and limit the hours of operation would severely restrict travel opportunities to our Nation's Capital and hamper airlines in their ability to schedule flights to meet travel demands.

The reason given for the proposed service curtailment is the aircraft noise impact of Washington National's operations. While no one argues the need for an airport to be a good neighbor, I do not believe any truly convincing evidence has been advanced that would indicate the proposed operational changes would provide enough environmental relief to justify the adverse impact on public air service. Further, I think the fact that the FAA is proposing to lift the ban on two and three engine wide body service to Washington National has to be viewed as an environmental gain because of the reduced noise characteristics of these planes and the fact that they have greatly increased per plane capacity.

Without question, the importance of the Washington National Airport far exceeds strictly its service function to the Washington area. It is one of the most popular and important airports in the country and serves as a vital air link with many

other parts of the Nation. As such its "National" designation is highly appropriate and to restrict its use would be most unfair to the millions of passengers that seek to use it. Given the fact that deregulation makes the FAA proposal highly suspect on conceptual grounds and that the environmental gains to be realized are not clear cut, I would lend my voice to those who call for the elimination of restrictions on the airport or at least a more complete review of alternate plans that currently exist.

Mr. ANDERSON. The committee will come to order.

We are fortunate to have three very distinguished colleagues with us here today; from right to left, Mr. Buchanan, Mr. Devine, and Mr. Carr.

We do have some of your prepared remarks, and they will be made a matter of the record. You can read them or extemporize, however you wish.

[The following was received for the record:]

PREPARED STATEMENT OF CONGRESSMAN BOB CARR

Mr. Chairman, I appreciate this opportunity to testify before your committee, which is considering certain rule changes affecting the operations at Washington National Airport. As a Member of Congress, I am interested in mass transportation policy as it impacts on the public and, as a part-time resident of this city, I am interested specifically in the transportation policy here, not only at National, but at the surrounding airports and other public transportation modes as well.

So the subject of your committee interests me; the proposed rule changes, though, more than interest me—they have a direct impact on my life as a pilot who bases his plane at National. It is to this point I want to speak, commenting specifically on the proposed rule that would outlaw other than emergency landings at National between the hours of 10:30 pm and 7:00 am. I am opposed to this section for four reasons:

First, it simply lacks clear rationale. Second, the term "inconvenience" oversimplifies the problems this change creates and totally disregards those general aviation fliers who are based at National.

Third, by the FAA's own admission, this section impacts only a small percentage of operations.

And, fourth, general aviation is already doing its part to ameliorate congestion at National.

LACK OF RATIONALE

Let's talk about why even do this in the first place.

The proposal completely lacks a definitive statement of reason or rationale for closing the airport to all but emergency operations between the hours of 10:30 pm and 7:00 am. The conclusory "benefits to the community" in the last sentence of the second to the last paragraph of the section "Hours of Operation" hardly fills the bill. What benefits? What community? If we're really talking about noise here, we all know that what most concerns those opposed to operations at National is jet noise early and late in the day. Propeller noise is not a big contributor to this problem and, while curtailing night flight will reduce total noise levels somewhat, it will not reduce the degree of noise during the periods of greatest concern to the residents nearby. Again, I assume this may be a reason—the proposed rule does not make it clear.

Why the airport should be closed between those hours and what is hoped to be gained should be explicitly set forth. People affected are left in the dark as to what is its purpose. This results in a lack of due notice and an impairment of the right to make thoughtful comment, as opposed to general complaint. This is in contrast with the proposal to adjust the current curfew for certificated air carrier operations both in the summary and in the body of the information. Though, except for "bunching," this is pretty skimpy too. I am left to assume that there is no reason for closing the airport between those hours. Therefore, it would follow that to do so is arbitrary and capricious. If it is without benefit, why do it? If it is with benefit, why not expressly tell us what it is? Failing such a statement, the aviation community has a right to assume that airports are more beneficial open than closed.

INCONVENIENCE

The proposal states: "FAA recognizes that an inconvenience may be caused by certain travelers . . ." the proposal continues: "FAA believes that this inconvenience

can be minimized by careful planning and by greater utilization of Dulles and BWI." "Inconvenience" is, of course a relative term. Certainly there are many situations which would fall into that category. Absent knowledge of specific circumstances or specific survey analysis it is relatively easy to imagine that transient travelers may have the flexibility to adjust to the "inconvenience." On the other hand there are dozens of us who are based at National. We have made commitments for hangar, tie down space and maintenance at National. We park our private automobiles at National when we leave and expect to return to them and to our homes (mine is in the District of Columbia). There is a vendor at National under contract to the FAA who depends on our business as regular customers. For us the proposal is much more than "inconvenience" which can be "planned" away. For us it is a major operational limitation. For example, suppose instrument delays, deviation around thunderstorms, an unplanned intermediate precautionary landing (I've had two in the last year), a slow or busy line boy at a previous fueling stop or other unexpected event causes the ETA to go beyond 10:30 pm. At this point under your proposal the choices are two. First, you can attempt last minute accommodations late at night (possibly in a remote area where lodging and public ground transportation is slim at best). Second, you can proceed to Dulles or BWI. The only problem is that you left your car at National and first thing tomorrow you've scheduled maintenance at National (after being on a waiting list for two weeks). Repositioning aircraft, temporarily or permanently, can be an expensive and time and energy consuming task, not a mere "inconvenience."

PERCENTAGE OF OPERATIONS AFFECTED

The proposal makes a curious statement that the curfew is only a problem for about 5 percent of the operations. If it is so insignificant why prohibit it? If traffic is so light at these hours it is hard to see how their elimination could solve problems or provide a benefit. Is the glass half full or half empty?

GENERAL AVIATION'S CURRENT CONTRIBUTION

In any proposal of this nature, it is hoped that affected parties can share the burden equally. General aviation, as you know, currently "owns" 20 percent of the hourly slots allotted to operation (a landing or takeoff). Under Alternative B, Numbers of Operation, this percentage would be reduced to 15 percent of the total, or a GA decrease of 25 percent. I can live with that, but only if I can continue to use the airport at night since jet aircraft severely restrict my availability to the runway during the day. General aviation is doing its share and is prepared to do more, as long as it is reasonable.

Mr. Chairman, inherent in all this discussion is the overwhelming need for a clearly stated and defined long-term objective for the use of National and Dulles. Does it make sense to allow passenger numbers to increase at National? Are we going to close the airport in 1990? Are we going to build a rapid transit system to Dulles to make it more attractive to the business flyer? All these questions, and the bulk of the proposal under discussion, hinge on our policy toward (a) jet aircraft and (b) the commercial passenger. None of it is drastically affected by general aviation although the converse drastically affects us "little guys". I ask, then, that you reject that part of the proposal dealing with closing the airport completely at night. I ask that for the benefit of general aviation and for the benefit to those of us who not only fly to DCA, but who call it home.

Thank you.

TESTIMONY OF A PANEL OF CONGRESSMEN, INCLUDING: HON. JOHN BUCHANAN, ALABAMA; HON. SAMUEL L. DEVINE, OHIO; AND HON. BOB CARR, MICHIGAN

Mr. BUCHANAN. Thank you, Mr. Chairman.

Mr. Chairman and members of the committee, I appreciate the opportunity to testify today on a matter of vital concern to the people who live near the city of Birmingham, which I have the honor to represent in the Congress, and to the entire State of Alabama.

For the past 15 years, the residents of Birmingham and the surrounding area have been denied nonstop air service to Washington National Airport, not due to any formal rule or regulation, but

as a result of an informal agreement between airlines to which the Federal Aviation Administration (FAA) acquiesced. This informal Federal policy establishes a 650-mile limitation on nonstop flights to and from Washington National. Seven cities which are beyond the 650-mile limit were "grandfathered" into the agreement and currently enjoy nonstop service. These cities had nonstop service on the arbitrarily established cutoff date of December 1, 1965. Regrettably, Birmingham does not enjoy the "grandfather" status, even though we had nonstop service prior to the cutoff date.

In addition, all of the "grandfathered" cities are farther from National Airport than Birmingham. Several are more than 1,000 miles. It should be noted that although the FAA has recorded Birmingham as being 3 miles over the 650-mile limit, the city limits, control zone, and outer marker are all within a 650-mile radius of Washington National.

The fact that 3 little miles have caused our citizens all of this trouble and inconvenience is a matter of some frustration to me and to our local government officials. Our previous mayor even considered paving a strip 1 foot wide and 3 miles long in the direction of Washington, in the hope of resolving this matter.

Therefore, I am very pleased that the Federal Aviation Administration proposed last December the expansion of the perimeter to 1,000 miles as part of its effort to establish comprehensive rules for the future operation of Washington National Airport.

Securing nonstop air service from Birmingham to Washington is vital to the future economic development of the Sixth District and the surrounding areas of the State. Convenient air connections are among the most important factors in the decision of a business to locate in a particular area. As the relationship between Government and business continues to grow in complexity and importance, it is vital to any business to have ready access to Washington, D.C. I have received numerous letters from Birmingham area businessmen illustrating just this point.

Washington, D.C., is one of Birmingham's top five air markets and it has been clearly demonstrated that nonstop air service between Birmingham and Washington National is economically feasible. In its own studies of intercity passenger volumes, the FAA projects that there is sufficient demand for the institution of nonstop service from Birmingham to Washington National in the absence of the 650-mile limit.

The proposed formal abolition of the 650-mile limit and the substitution of a 1,000-mile perimeter is endorsed strongly by the city of Birmingham, the Birmingham area chamber of commerce, local businesses and area citizens. In March, members of the Alabama delegation wrote Secretary Goldschmidt urging this action. I have delivered today a letter to Chairman Anderson signed by the entire Alabama delegation supporting this change.

The establishment of a flat, 1,000-mile perimeter will end the discriminatory treatment of Birmingham and other cities such as New Orleans, Kansas City, and Fort Lauderdale. It will not, however, increase the number of flights to and from Washington National as the number of flights will continue to be controlled by the FAA slotting procedure. The perimeter change will not have an adverse impact on the residents along National's Potomac flyway

and it will not change Washington National's status as a medium- and short-haul airport.

This proposal merely will allow Birmingham and other cities to compete fairly for those slots that are established by the FAA. The proposed 1,000-mile perimeter rule will be one step toward free and fair competition in the airline industry, one of the mandates of the Airline Deregulation Act of 1979. This proposed policy change will eliminate an arbitrary and very frustrating burden imposed on travel between Birmingham and Washington, D.C.

It is my fervent hope that this committee will encourage the FAA to proceed with all due haste and promulgate a final rule on this matter by the Agency's target date of August 15, 1980.

Mr. ANDERSON. Thank you, John.

The next witness is Sam Devine of Ohio.

Mr. DEVINE. Thank you, Mr. Chairman. I am probably not in compliance with the committee rules in not having prepared a formal statement, and my remarks will be brief. However, I think I can provide a little history that can be helpful to the committee in the overall handling of the problem of Washington National Airport.

I first started flying into this airport in 1950, and I watched the transition there. When I came to Congress 22 years ago, I was on the then Committee of Aviation and Transportation, chaired by our former colleague, John Billings, of Mississippi. Washington National at that time was handling only piston equipment. I do not think there were many jets flying at that time. But I was here during the transition period from the piston traffic to the jet traffic. I heard the gnashing of teeth, the wringing of hands, and the wails and the moans of the residents of the area, about what a great tragedy it would be if they permitted jet traffic into Washington National. None of the things have happened that they predicted, those awesome, terrible things.

I am troubled, in fact, I kind of have a hangup, about people who move to close proximity to an airport and then beef about the noise. You have to learn to accept those things that are there when you move there, and with progress, of course, they are going to have to expect some changes.

But as our previous witness from Florida, Mr. Gibbons, said, these things are nationwide, these are things we have to learn to live with, and he knows of no one who has suffered any severe damage from the noise problem.

At the time we permitted the transition from piston to jet equipment into Washington National, it was part of the agreement, if I can use the term agreement, that there would be no four-engine jet equipment permitted in there because of the noise factor, because of the size, because of the safety factor. And they have complied with that, and as you know, with the exception of, I think, Air Force 1 on just one or two occasions for weather reasons that it was permitted to land at Washington National, there rarely is a flight that exceeds the size of the 727, which as you know is a three-engine jet.

I come from Columbus, Ohio, the capital city of Ohio. It has grown in population from the time I came to Congress, first elected

in 1958, from something around close to 400,000 to now close to 700,000.

At that time, we had either six or seven nonstop flights per day each way between Columbus and Washington. At that time, the cost of an airline ticket roundtrip was \$42. When I fly out of here, either tonight or tomorrow morning, it will be my 1,530th flight just between these two terminals, Columbus, Ohio and the Washington National, CMH and DCA.

With air deregulation, those six or seven flights a day have reduced, up until last week, to three, with one airline, TWA. Old Allegheny, now known as US Air, has just been permitted to fly into Washington National which has increased flights from three back to five, at \$164 per roundtrip.

But I just want to say to the committee for this capitol city, if we are excluded by the FAA arbitrarily drawing a line of 500, 650 miles, or whatever, it is going to create a hardship, particularly if it is the intention of FAA to divert from Washington National, which is most convenient to the Capitol, not only for those of us who fly regularly as Members of Congress, but more importantly for our constituency, who fly every day, rather than just Mondays and Fridays. If they force them to fly into Dulles or into Baltimore for economic reasons to bailout bad decisions of years ago, it is going to take passengers twice as long to make the same trip that we have taken all these years. It takes us normally around 43 minutes to fly from Columbus to Washington and about 52 minutes from Washington to Columbus because of wind conditions. If our people from that area are required to fly into either Dulles or Washington National, the trip will be pretty much of a 2-hour trip—twice as long each way.

For that reason, I feel that consideration should be given to those of us who live within, say, a 500-mile perimeter, not to be inconvenienced to accommodate those who come from the west coast or from miles that are exceeding that limitation contained in the legislation.

I thank the chairman for his time and his indulgence.

Mr. ANDERSON. Then, if the FAA were to extend the perimeter route to 1,000 to allow more flights in, and at the same time cut down the number of flights, that would threaten your flights in from Columbus? Is that correct?

Mr. DEVINE. It certainly would, yes.

Mr. ANDERSON. Mr. Carr?

Mr. CARR. Thank you, Mr. Chairman.

I appreciate the opportunity to be with you today, and I appreciate the time you have given me.

I would like to distinguish myself just a little bit from the colleagues. I sat and listened to them pleading the cases of their particular city or of the particular airline or passenger. I, too, have a city, Lansing, Mich., of 250,000 people, and it is getting increasingly difficult to get good airline service between Lansing and Washington, D.C. I am aware of all those problems, and you have had abundant testimony on that.

I would like to take a bit different tack, because I have a couple of other "hats" that I can wear. No. 1, I am a resident of Capitol Hill, southeast, and that puts me approximately right underneath

what is known in air traffic control terms as the 072 radial of the Washington National VOR. That happens to be the radial that flights department to the Northeast, either to Baltimore, Philadelphia, Boston, New York—with some exceptions, most of those flights go out that way.

So I live under the 072 radial, and I am somewhat familiar with the noise problem, and I also, living on Capitol Hill, am aware of the church bell that rings every morning at 7 o'clock. I know when it is 7 o'clock. If they miss the bell, I can hear the jets cranking up at National Airport.

Mr. SNYDER. Excuse me. You live in southeast or southwest?

Mr. CARR. Southeast, third and C, southeast.

Mr. SNYDER. Well, I live at sixth and East Capitol—

Mr. CARR. You are close to the 072, as well.

Mr. SNYDER. Well, I never have heard an airplane. I guess I am getting deaf.

Mr. CARR. Well, maybe it is because I love flying, and that brings me to my second point. I am appearing before you today as a pilot who frequently uses—in fact, twice a week, I am in and out of—Washington National Airport. And I have a bit of a different perspective, because I am sitting in the cockpit looking out ahead of me.

And I come to you saying that with all of the great air traffic controllers we have in the Washington, D.C., area, and they do need to be commended, they are among the best that I have ever encountered anywhere in the United States, and the pilots, both commercial and general aviation, that I have talked to that have come in and out of Washington National Airport, exercise a great deal of skill, I do believe that there is a problem at Washington National Airport. You just cannot sweep it away; you cannot sweep it under the rug. And, according to many of the commercial pilots I have talked to, Washington National is an accident waiting to happen.

I believe that statement, and I believe something needs to be done. And I applaud the FAA for an attempt. However, I criticize this particular attempt as being defective in many respects.

We have had a lot of testimony here about the convenience and about the access of Washington to the Nation, and as you pointed out, Mr. Chairman, if access were the key criteria, we would probably move the Capital city of the Nation closer to Kansas City or St. Louis or someplace like that, if that were the only parameter.

But I wonder how we in Congress are going to feel the day we wake up, or even the afternoon where we are standing around the cloakroom, and we hear about a 727, in bad weather, with adverse winds and turbulence, swirling around Crystal City, where an airplane went down and where there were not just ordinary constituents onboard those airplanes, but maybe even a few Members of Congress and a few congressional staff.

I recall when I first came to Washington the tragic crash of TWA out at Dulles Airport. I knew one of the staff members who was killed on that flight. One of the staff member's family, the wife, was also a staff member for a dear former colleague, Barbara Jordan. And I knew the talk around Capitol Hill at that time.

Well, without regard to the fine safety record of National Airport, and without regard to the fine experienced air traffic controllers and pilots, be it commercial aviation or general aviation, I believe that Washington National Airport is overdue for a major accident. And I wonder if the Congress will have any conscience about that when it happens, because the finger is going to be pointed directly at perhaps this committee or the Congress of the United States, for our intransigence, our foot-dragging, for our own prerogatives and our purse prohibiting something being done at Washington National Airport. From my perspective, something does need to be done, and this Congress should not get in the way of it being done.

Now turning to the question of whether the FAA's current proposal pursues that goal sufficiently or with the greatest amount of justice. I think it does not. I think it is a bit of a bandaid and a sop to some people who have various noise complaints at National Airport.

The FAA, to my mind, has consistently avoided a long-term, well-thought-out, well-publicized and politically supportable comprehensive air plan, and public mass transit plan, for the Washington metropolitan area.

They have not come forth with the kind of planning or sought the kind of support that I know would be here on Capitol Hill. If they were to support, say a helicopter airlines to Dulles, perhaps leaving from a heliport which we might create in the downtown Washington Metropolitan area—or rapid mass transit to Dulles, so that more people would be encouraged by its convenience over National. Instead, what do we get out of the FAA? We get rather cosmetic attempts to limit this or close that or curfew this. And I just do not think it really addresses the crux of the problem.

Specifically, I would like to state that as a general aviation pilot and one who bases an airplane at Washington National Airport, the proposed curfew between 10:30 at night and 7 a.m. is a tremendous operating disadvantage to those who base their aircraft at Washington National Airport.

We are people who have contracted maintenance facilities for ourselves there, and we pay very high rates of labor to a contractor who is contracting with the FAA to offer various kinds of maintenance and support services, and we are people who are coming home; we are terminating flights. We are not people who are just transients who might be able to rearrange our schedules a little bit to plan to leave Washington a little later or arrive a little earlier or rearrange our schedules. For us, it is a major operational disadvantage. I suggest that the rationale of the FAA in their own proposed rulemaking was incomplete. There was almost a complete lacking of a clear rationale for the 10:30 to 7 curfew.

By the FAA's own admission, such a curfew would impact a very few flights, and therefore I suppose you can get to the question of is the glass half full or half empty. I think the aviation community is entitled to the presumption that airports are more of service open than closed, and I would oppose that curfew.

You have my rather lengthy statement, Mr. Chairman, in the record. I just want to make one slight rebuttal to my good friend,

Sam Gibbons. I cannot let it go by, because Sam's easy solution is to get rid of all general aviation out of National Airport.

Well, Sam happens to come from Tampa, Fla., an airport that I know well because my family lives down near Sam. Unfortunately, however, there are a lot of communities that do not have the luxury of a large Tampa International Airport. There are a lot of communities who cannot even get an airline into their community, and there is a lot of industry all over this country, and there are a lot of people who are employed in industry—not only Congressmen like John Glenn and myself, who fly home every weekend. There are a lot of people who, if they fly, have to fly by general aviation.

General aviation is not a bunch of sport flyers out drilling holes in the sky just to be energy-inefficient and get in the way of commercial airliners. There is serious business, there is serious transportation, and general aviation must be guaranteed its share of landing slots at Washington National.

I think that general aviation is willing to accept a reduction in slots if we are provided with the additional flexibility to rearrange ourselves to suit the traveling commercial public. And I think most general aviation pilots and operators would be willing to do that.

However, the FAA is telling us through this regulation that we reduce the number of general aviation slots, and then reduce the flexibility to get around that operating difficulty by having this curfew.

So I have to argue with my good friend, Sam Gibbons. I have been in and out of his airports down there many times, both Tampa International and MacDill Air Force Base, and I would tell the committee in rebuttal to Sam, that the approaches to Tampa's two major north-south runways do not overfly significantly populated areas. A big chunk of it, half of that, is over water.

I would also tell the committee, having flown in and out of MacDill Air Force Base that—and I would ask the committee to check this—to the best of my knowledge, if you extend the runways in either direction—that happens to be a northeast-southwest runway there—it does not overfly major populated areas. And while F-4 Phantoms are indeed noisier than DC-9's, and in fact, you do have flights of three and four at a time, their rate of climb is so fantastic as compared to a DC-9 that I would submit, pending some kind of a check, that the actual decibel levels in and around MacDill Air Force Base are no greater than they are, say, at Tampa International or out here at Washington National.

Aviation, as this committee knows, is a complex thing, and I would invite any member of the committee to come and fly with me someday up and down the river and see what the approach looks like from the front end of the airplane, and what you have got to put up with. This is a very difficult approach.

I would also ask the committee to use its good offices to ask the FAA for the numbers of go-arounds, percent of go-arounds, that is, a balked landing, where the pilot decides it is not good, it is not good enough. I do not have a statistic for you, Mr. Chairman, but I submit that if you do collect that statistic out at Washington National, you are going to find a larger percent of go-arounds at Washington National than you are at any other comparable airport in the Nation. And that is a reflection, that is an indice, of

what kinds of difficulties those pilots face coming down the river, particularly in bad weather. And I am adamantly opposed to the bringing of any wide-bodied jets into Washington National. It simply is not safe, and I would concur on that with the witness that you had yesterday.

Mr. Chairman, I have taken far too much time, but I appreciate your allowing me to put these perspectives into the record.

Mr. ANDERSON. Thank you, Bob, Sam, and John, for an excellent presentation.

Mr. DEVINE. Mr. Chairman, may I add just two sentences, just for the sake of accuracy?

Mr. ANDERSON. Certainly.

Mr. DEVINE. No. 1 is that the curfew was adopted here at Washington National at the time the jet equipment was permitted in, in order to satisfy the people who were complaining about it coming in. And as the gentlemen from Michigan says, I do not think it serves any real useful purpose now.

The other thing has to do with Mr. Carr saying that Washington is "an accident waiting to happen," which we hope never does happen, and it would be tragic. But the accident to which he made reference was TWA flight 514, originating in Columbus, Ohio, destination Washington National Airport, which was diverted because of winter weather conditions to the Dulles International Airport, and the crash resulted not because of traffic but because they flew into the side of a mountain.

Thank you, Mr. Chairman.

Mr. ANDERSON. Just to clarify your comments on the general aviation—and I am sure you are aware of it, Bob, but the others might not be. Currently, we are limited to roughly 60 an hour, and that, I understand, was put in basically because of the limitation of the air traffic controllers, as a safety measure. And they are currently divided, 40 air carrier, 8 commuter, and 12 aviation.

Now, there are two suggestions. The first suggestion that is being proposed is that the number of air carriers be reduced from 40 to 36, the commuters increased to 12, and general aviation remain the same at 12.

There is a second option, however, of giving the commuters 3 additional ones, to 15, and taking that away from general aviation. So the option would be 3 less for general aviation and 15 for the commuters, instead of the present 8 for commuters now.

And of course, I think maybe one comment should be made on that, that this only applies to instrument landings, and many of the general aviation come in on visual anyway, so they are really not part of that count.

Our problem is where is it going to come from, and I thought you were very clear in pointing out the problems that we have here, and I appreciate it, Bob—

Mr. CARR. Well, if I might, Mr. Chairman, it would not bother me if they took the nine, if they gave commuters the three from general aviation, that would not bother me at all. The 60 per hour—

Mr. ANDERSON. That is a safety limitation, understand, but the air traffic controllers can only handle that now.

Mr. CARR. Well, they actually handle many more than that. In good weather, they will actually handle many, many more than that. And you know, you could take general aviation guaranteed slots down to six.

Mr. ANDERSON. In good weather, they do not really need it—

Mr. CARR. Yes, I would not mind that. And general aviation has a degree of flexibility in one area of operation that the commercial airlines do not, and I agree with that. I am all for commercial aviation. But if you reduce our flexibility in one place, and then totally shut the airport between 10:30 at night and 7 in the morning so that we do not have an alternative, then it does seem that the FAA regulation is focusing on general aviation as a guilty party.

I also agree with the FAA desire to get rid of the bunching problem at 59 minutes after the hour.

Mr. ANDERSON. That is my third question to you.

Mr. CARR. Well, I agree.

Mr. ANDERSON. I might raise that right now. Yesterday, we heard testimony under the present policies for National that the airlines schedule about 18 flights at 9:59 p.m., and that it takes until 10:30 or later for these flights to be completed, and this is a source of substantial annoyance to the residents around the airport. The FAA now proposes to allow no operations after 9:30 and to permit only 18 operations between 9 and 9:30.

I would like to have the comments of all three of you on that question.

Mr. CARR. Well, I support elimination of the bunching problem, because clearly, all those airplanes cannot land at 59 minutes after the hour, and in effect, it is a way of effectively stringing out.

Now, what is the answer to that; has the FAA proposed the right answer. Well, I am not quite sure. I think I would at that point agree with many of my colleagues who testified, and in effect avoid the bunching problem by passing a rule which would legitimize the present practice: Airplanes landing up to 11 at night. And you might want to put some operating limitations on them, in terms of—you know, the night traffic is not as demanding, frankly, as the day traffic. The density of the air traffic is a lot less, and I think you can probably impose some other kinds of noise abatement types of procedures.

I know that you certainly can do it for general aviation aircraft, because they do it to me all the time. They bring me 5 miles to the airport at 8,000 feet and say, "You are cleared to land." And that is a tough job, let me tell you. These airline captains have my absolute respect for their skill. But it takes a darned good pilot in a light plane, which does not have the drag features of a large commercial aircraft, to conform to those kinds of descent profiles. So I give our general aviation pilots high marks, too, for their experience and their skill. And frequently, they are asked to put their aircraft right on the limits of their capability to perform the inbound noise abatement procedures that the FAA has adopted. But I do not see anybody squawking, and I think it can be done.

Mr. ANDERSON. John, just one question to you, unless you want to answer the other. I was sort of curious as to why, since Birming-

ham is only 3 miles outside the perimeter, it was not "grandfathered" in at the time the others were?

Mr. BUCHANAN. Mr. Chairman, it was a technicality. We, at the precise point of the cutoff date of December 1, did not have a direct flight to Washington. We had for a long time had one; we had just lost it. All the studies we have done or that FAA now has done would indicate we could have justified it, but due to airline decisions, we had just lost our direct service. We had hoped the loss was temporary when we got cut out of the "grandfathered" group because we did not, on December 1 of that year, have direct service.

I think we could make a real case, indeed, we have made a case to FAA in the past, that we really should be in that group.

Mr. Chairman if I could just add a couple of things. I delivered to you this morning a letter signed by the entire Alabama delegation.

Mr. ANDERSON. Yes. The statement of the Alabama delegation will all be made a matter of record.

Mr. BUCHANAN. Thank you.

[The following was received for the record:]

JOHN D. BUDHANAN, JR.
City of Birmingham, Alabama

MEMBER
COMMITTEE ON PUBLIC AFFAIRS
SUBCOMMITTEE ON INTERNATIONAL OPERATIONS
AFRICA
COMMITTEE ON EDUCATION AND LABOR
SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION
POST-SECONDARY EDUCATION
HEALTH AND SAFETY
COMMISSION ON SECURITY AND COOPERATION IN EUROPE
PRESIDENT'S COMMISSION ON GOALS

Congress of the United States
House of Representatives
Washington, D.C. 20515

June 11, 1980

ASSISTANT THE ASSISTANT
JAMES L. APPLE
200 RAYBURN HOUSE
OFFICE 40-1400
WASHINGTON, D.C. 20515
205-625-4521

DISTRICT OFFICE
CAROLYN R. GOLDEN
BIRMINGHAM OFFICE
ROOM 102, FEDERAL BUILDING
100 FIFTH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
205-625-4522

The Honorable Glenn Anderson
Chairman, Subcommittee on Aviation
Committee on Public Works and Transportation
United States House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

For the last several years, Birmingham, Alabama, and other Southern cities have been seeking relief from a federal policy barring non-stop flights to and from Washington National Airport from cities 650 miles away. The largest airport in our state--Birmingham--has not been allowed to compete for non-stop service to National Airport.

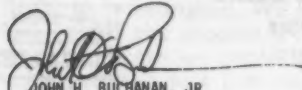
The importance of this issue to Birmingham and its citizens is well known. Establishment of non-stop Birmingham-Washington National Airport service is a key part of Birmingham's long-term efforts to improve its air service and avoid time- and energy-consuming layovers in Atlanta.

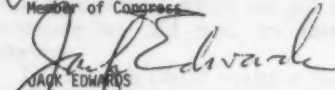
In December 1979, the Federal Aviation Administration proposed to expand the perimeter to 1,000 miles as part of its effort to establish comprehensive rules for the future operation of National Airport. In March, several of us joined with our colleagues in the Senate to express to the Secretary of Transportation our strong support for adoption of a 1,000-mile perimeter. A copy of that letter is attached.

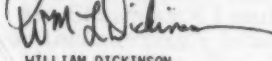
We applaud the FAA's efforts to adopt rules for National, particularly in view of the multiple aviation and community interests that it must consider and balance. During the comment period which ended on April 15, the FAA gathered comments from a broad spectrum of the public on the measures it has proposed, including enlargement of the non-stop perimeter.

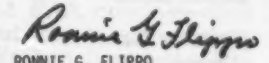
It is our hope that this Committee will encourage the FAA to proceed expeditiously with the rulemaking and promulgate a final rule by the agency's target date of August 15, 1980.

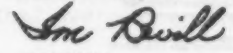
Sincerely,

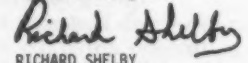

JOHN H. BUCHANAN, JR.
Member of Congress


JACK EDWARDS
Member of Congress


WILLIAM DICKINSON
Member of Congress


RONNIE G. FLIPPO
Member of Congress


TOM BEVILL
Member of Congress


RICHARD SHELBY
Member of Congress


BILL NICHOLS
Member of Congress

Enclosure - 1

AGRICULTURE, NUTRITION, AND
FOODS
CHAIRMAN: SUBCOMMITTEE ON
AGRICULTURAL RESEARCH AND
GENERAL LEGISLATION
RURAL DEVELOPMENT
ENVIRONMENT, SOIL CONSERVATION,
AND FORESTRY

United States Senate

WASHINGTON, D.C. 20540

March 25, 1980

COMMERCE, DEPARTMENT OF
RURAL MARKETING
FINANCIAL INSTITUTIONS
SMALL BUSINESS
GOVERNMENT REGULATION
GOVERNMENT PROCUREMENT

The Honorable Neil Goldschmidt
Secretary
Department of Transportation
Washington, D.C. 20590

Dear Secretary Goldschmidt:

We strongly urge adoption of the proposed DOT/FAA regulations establishing a 1,000-mile "perimeter" on non-stop flights to Washington National Airport. As you know, we have in the past expressed strong opposition to the informal "650-mile limit" which has unfairly prevented the City of Birmingham from obtaining convenient air service to the nation's capital. We agree with DOT/FAA that any limit on non-stop service to National Airport should be formally adopted through the rule making process, and we welcome this opportunity to offer our comments.

The alternative mentioned in the proposed rule of retaining a "650-mile limit" with the continued grandfather exceptions for seven cities is totally unacceptable. The seven exempted cities would be Minneapolis, St. Louis, Memphis, Tampa, Orlando, West Palm Beach and Miami. The present 650-mile arrangement, which is intended to channel longer non-stop flights to Dulles and BWI airports, does not in fact effectively distinguish among cities on the basis of their distance from National Airport. Indeed, Birmingham is closer to National than any of the seven grandfathered cities. As the FAA acknowledges in its own commentary on the proposed rules (45 Fed. Reg. 4314), adoption of the 1,000-mile limit would eliminate the discriminatory treatment of nongrandfathered cities without changing National Airport's status as a "medium-" and "short-haul" airport.

The 650-mile limit with its grandfather provisions has been extremely unfair to Birmingham. The grandfather exemptions were based on an arbitrary cutoff date, December 1, 1965, on which Birmingham did not happen to have non-stop service in the recent past. The 650-mile limit with its grandfather provisions has for nearly fifteen years essentially frozen the pattern of air service to National Airport.

that existed on December 1, 1965. In those fifteen years, Birmingham, along with much of the rest of the South, has experienced steady economic and population growth. Yet it has been hindered in its development by the anachronistic 650-mile limit which has denied it ready access to the increasingly-important seat of our federal government. Although the Civil Aeronautics Board has responded to Birmingham's need for better air service by granting eleven carriers certificates to operate non-stop service between Birmingham and National Airport, see C.A.B. Order 79-4-39 (April 8, 1979), which granted eight carriers the right to offer non-stop services between Birmingham and National, in addition to the three already holding such certificates, Birmingham travelers must still suffer the delays and inconvenience of stopping or changing planes at the notoriously-overcrowded Atlanta airport. This is particularly frustrating in that Birmingham's city limits actually are only 645.7 miles from the National Airport terminal, and thus within the 650-mile limit.

The FAA itself has found that based on an analysis of inter-city passenger volumes, Birmingham, along with three other cities (New Orleans, Kansas City, and Ft. Lauderdale) would be likely to receive non-stop service to National Airport in the absence of the 650-mile limit. There is no rational basis for not giving Birmingham a fair chance to obtain this needed service. This is especially so in light of the Airline Deregulation Act of 1978, which established a national policy favoring open competition in the airline industry free from artificial restraints.

New non-stop service from the nongrandfathered cities will have no adverse impact on the residents along National's Potomac flyway. As the FAA points out in its comments on the proposed regulations (45 Fed. Reg. 4318), new service from these cities would not increase the number of flights at National, since the maximum number of flights will be controlled by an FAA slotting procedure. Furthermore, the FAA comments state, "it is not believed that the origin and destination points of the aircraft materially affect the environment around National Airport provided that these points are not long-haul segments."

In addition, the opening of National to non-stop service from these new cities will not mean a decrease in the use of Dulles Airport. Hourly limitations on scheduled flights to National will prevent any major shift in usage from Dulles.

Finally, although it has been stated that establishing the 1,000-mile perimeter would be detrimental to service provided to cities closer to Washington, the increased number of commuter flights to be allowed under the proposed rules would presumably make up for any loss in service by national regional carriers.

In summary, we strongly urge the Department to adopt the 1,000-mile limit. This step will correct an inequity that has been visited on Birmingham and other cities in the South for a decade and a half. This action will also be a step toward freer competition in the airline industry. It will have no adverse effect on the Washington environment, on the level of utilization of Dulles airport, or on air service to nearby cities. It will eliminate the delays and inefficiencies (including wasted jet fuel) inherent in routing flights from Birmingham and other cities through the congested Atlanta airport. Finally, and perhaps most importantly, it will eliminate the discriminatory treatment of the cities that were not grandfathered under the 650-mile arrangement, and will, in the FAA's own words (45 Fed. Reg. 4317) "treat cities of equal distance equally".

Sincerely,

Donald W. Stewart
DONALD W. STEWART
United States Senator

Howell Heflin
HOWELL HEFLIN
United States Senator

John Buchanan
JOHN BUCHANAN
Member of Congress

Bonnie G. Flipppo
BONNIE G. FLIPPO
Member of Congress

Richard C. Shelby
RICHARD C. SHELBY
Member of Congress

Mr. BUCHANAN. I have been provincial without apology in my testimony, because we do need help in Birmingham. But let me just briefly hold up one more aspect of the safety situation.

It seems to me that if you look at the total safety picture—and maybe the committee has studied it recently—but I was ranking on Jack Brooks' Transportation Subcommittee on Government Operations some years ago, when we looked at air safety, and at that time, I was concerned about the Atlanta Airport. As somebody who either takes off from or lands in the Atlanta Airport 120 to 160 times a year, I sincerely feel I am taking my life in my hands every time I do so, or a great many times when I do so. They can fill up that airport, they can turn the other half of Atlanta into terminal facilities if they see fit, but I do not see how it is going to significantly help the problem of congestion in Atlanta.

Now, I am not unconcerned about the space limitation in Washington National Airport. I do think safety should come first. I cannot see that the curfew has the same level of importance as safety considerations that might be served by yielding on the curfew side.

I board a plane at 3:20 a.m. in Birmingham that flies in about 2:50 a.m., the one I usually ride, to go to Atlanta and wait for a 6 o'clock flight to ride to Washington. Now, we seemed to have lived through that all right, and I cannot believe there are significant safety features involved in the curfew decision. So it seems to me there could be some yielding on that.

But I would not have anybody yield on a safety consideration—that is, say there would be more slots than safety would dictate in Washington National Airport. But I think the same is true of Atlanta. It is not this simple, of course. But if you take a flight that is one of the many flying to Atlanta, Ga., transfer over to Birmingham, Ala., and make it a direct nonstop flight from Washington to Birmingham it would make Atlanta, Ga., a little more safe. It would not change anything at Washington National Airport in terms of more slots or anything that would pertain to safety or noise pollution in the Washington area.

I just wanted to make that additional point, that when we look at safety, I hope we will also be looking at Atlanta, Ga., and not just at Washington, D.C.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you, Mr. Chairman.

I guess I am a little concerned, Mr. Carr, with your observation as to National Airport being an "accident waiting to happen." And I do not really understand how the TWA disaster at Dulles relates to that in any way. First, it was another airport, and second, the cause of that was a communications problem between the pilot and the controller. The pilot thought he was cleared to or able to descend to his final approach at, I believe, 1,800 feet, when in fact, he either was not or should not have been and went into the mountain there in bad weather. I do not see any relation to that at all to what we are discussing here today.

That is the only air carrier accident that I remember in my 16 years here, at either of these two airports. My best information is that the only air carrier accident—I am talking about with fatalities—at National was in 1949, when a Bolivian P-38 fighter came

out of Bowling and hit an Eastern DC4 and put it in the river and some people were killed. That was long before the slot allocation we are now operating under and it was before the advent of the air carrier jets.

We have been operating with the current slot allocation since 1969 at Washington National. I do know that a time or two when I have come in there, I have been caught in a little wake by a plane that had come in close at times. But it really concerns me that you consider it an unsafe airport, when in fact, it does have a good record. We have had a couple of general aviation accidents at both National and at Dulles since I have been here, but how do you rationalize that it is an unsafe airport, based upon the record?

Mr. CARR. OK. First, I did not offer the TWA—and I am glad for the opportunity to clarify it, because it was picked up by my colleague, Sam Devine—I did not offer the TWA experience as evidence of an unsafe National Airport—

Mr. SNYDER. Or an unsafe any airport.

Mr. CARR. Or an unsafe any airport. I offered the TWA experience as evidence for the kind of concern that we here in the Halls of Congress have when someone who is part of our official family here expires. And I think we are kidding ourselves if we think that if there is a Member of Congress who is killed in a general aviation or a commercial aviation accident at or near Washington or approaching Washington, on the approach, that there would not be a great deal of concern. And going to your second point about the excellent safety record of Washington National, when the day comes that that safety record comes to an abrupt end, you and I both know that it is going to be newspapers and columnists, editorialists all over this country who are going to point the finger right here as to why something was not done at National.

Now, you know, the DC-10 was a good, safe airplane before it had its accident. The problem at Washington National and why it is a potentially accident-prone airport is the difficulty of the approach. And as you know, because we are colleagues in aviation, it has to do with heavy weighting aircraft. The weight of the aircraft, it has to do with the flying speed of that aircraft to be able to land and stop safely before the other end of the runway. So you have the combination of heavily weighted aircraft at slow maneuvering speeds. And on top of that, with all the other adverse weather conditions that occasion every other airport in the country, you have two other phenomenon which other airports do not have with the frequency that National has. One is that the wind very rarely runs down the center line of the runway. Most airports align their runways based on prevailing wind. They have the luxury of doing that. National had to align its runways according to the space available on a landfill out over the Potomac. To get the required length, they had to align it for the peculiar geography of National, not for the prevailing wind.

So you have heavy crosswind phenomenon. Now, the crosswind also comes from—the most dangerous crosswind comes from the Crystal City direction. Crystal City causes turbulence. So it is not only a steady crosswind; it is a turbulent direct crosswind. And in point of fact, a lot of the diversions are occasioned in bad weather by crosswinds that exceed the ability of the aircraft to handle it.

Now, on top of that, the other disadvantage is that the river approach to 18 requires maneuvering that aircraft at rather sometimes spectacularly high rates of bank, turn rates, at very low altitude. And I will just tell you of an experience I had 2 weeks ago.

Two weeks ago, my aircraft was at Page Airways getting some maintenance, and I had to go to my district on a commercial airliner. I came back on a United 737. The approach looked good to me, and it was a day when there was not very much wind at all, but it was a hot, muggy, humid day here, where the density altitude was a lot higher than sea level, which is the approximate elevation of the airport.

The approach looked good, and I sort of figured that, like most commercial airliners, the airliner was cleared for landing on 18. We came down the river. But I began to be a bit concerned when we went by 13 and continued down the river, and the airplane then had to turn about 70 degrees, to land on runway 21.

Now, at the point of the turn, the pilot of that plane could not have been more than, 150, maybe at the outside 200 feet, above the water. In fact, my perspective, looking out the window to the wingtip, frankly scared the daylights out of me, because I thought the pilot was going to drag a wing in the water, in which event the plane would have cart wheeled across the end of 21 and 33, and we would all have been dead.

Now, maneuvering a heavy aircraft at slow speeds, at low altitudes, sometimes in turbulent crosswind weather, is an accident waiting to happen, as clear as I am sitting here.

And the fact that they have had an excellent safety record in the past is no relief. And Murphy's law—if it can happen, it will happen—as sure as I am sitting here—

Mr. SNYDER. Well, Bob, I think your argument is only an argument to close the airport.

Mr. CARR. No, I do not think so because you and I both—

Mr. SNYDER. That incident that you have just related would be just as bad with 40 slots an hour for air carriers or 1 an hour.

Mr. CARR. Well, I do not know what the communications were in the cockpit at the time, and for what reason the pilot elected to go to 21 and a variety of other things we cannot recount here.

All I am pointing out is that there are aircraft which are, No. 1, lighter, which approach at slower speeds, and which can maneuver around certain degrees of the compass with less risk to the occupants onboard. And I do not site that as an argument to close the airport at all.

Mr. SNYDER. Well, I knew you were not siting that argument, but those turbulent crosswinds over Crystal City are going to exist, regardless of the number of slots per hour.

Mr. CARR. Well, let me give you an example, and you might want to check this for the record, because I am just recalling it. But Meigs Field in Chicago has a similar north-south problem when the relative wind is generally aligned northwest and southeast. And the problem there is crosswinds coming across the skyscrapers—

Mr. SNYDER. That is the one on the lake?

Mr. CARR [continuing]. That is the one on the lakefront—and in the "Windy City", when the crosswinds get at a certain direction,

relative crosswind at a certain speed, they in fact do close the airport at Meigs. Now, it would be interesting to find out how similar the National north-south crosswind turbulence problem is with the Meigs situation and find out if they are keeping National open when FAA apparently has dictated that Meigs be closed.

Now, maybe the two things are entirely different. But they are similar, and probably bear some study.

Mr. SNYDER. Well, I cannot argue, of course, with the first part of your observation, if a serious accident does occur there, where the finger is going to be pointed; I think that is true. But on the other hand, I do not necessarily know that if and when it does and the finger is pointed, that it is going to be justified.

We lost one of our colleagues, I believe, in an air carrier accident in Chicago. We lost your majority leader in a general aviation accident, and a colleague also from Alaska in a general aviation accident in Alaska. I am sure there are others I cannot call to mind right now. I do not think that pointing the finger at us if one happens to drop in at National is anymore justified than it would be in any of those other instances.

I am really concerned that you feel—and I say it seriously—that National is that unsafe. I am a lot more concerned about that aspect than with all the hullabaloo we have been hearing about people moving around noise.

Just one observation you might give some thought to. I have heard some discussions about the possibility of trying to convince the military people that they ought to let general aviation into Andrews. I do not know whether that is feasible at all, or whether that would be a solution to some of the problem, but you might ponder that and see if there is any merit in trying to move in that direction.

Mr. CARR. If I might, I have pondered it, and I think it ought to be, with some limitation, open to general aviation. It is a low-security airport space, and in fact, their tower out there could not be justified under current FAA criteria if they were applying for a tower. The only reason they have a tower out there is because of the heavy VIP traffic. If that were a civilian airport applying for a tower, it does not have the utilization to qualify for an air traffic control tower.

So I would endorse, particularly on the so-called Navy side of Andrews, to have a limited access general aviation terminal there.

Mr. DEVINE. Mr. Chairman, I am sure the gentleman from Kentucky will recall when we were in this dispute about general aviation and jet equipment into Washington National, there was a great deal of consideration given to sending general aviation into what was then known as Bowling Air Force Base, which was abandoned as a military base. There was a great hue and cry, and the real estate lobby finally won. They did not want to put any buildings over there, in order that we could put general aviation in, but general aviation lost in that instance, and that would have been a very desirable, close-in location for general aviation.

Mr. SNYDER. I thank all of you for appearing.

Mr. ANDERSON. Thank you, gentlemen, for an excellent presentation.

Mr. SNYDER. I would like to ask unanimous consent that Federal Aviation Administration regulation 93.123 be made a part of the record at this point, indicating to you that this is the regulation that indicates the number of air carrier slots available at Kennedy, La Guardia, Newark, O'Hare, and Washington National.

I would say just for information that Kennedy has 70 per hour, La Guardia 48, Newark 40, O'Hare 115, and Washington National 40.

Mr. ANDERSON. No objection, so ordered.

[The following was received for the record:]

Chapter I—Federal Aviation Administration

Subpart K—High Density Traffic Airports

§ 93.123 High density traffic airports.

(a) Each of the following airports is designated as a high density traffic airport and, except as provided in

§ 93.129 and paragraph (b) of this section, or unless otherwise authorized by ATC, is limited to the hourly number of allocated IFR operations (takeoffs and landings) that may be reserved for the specified classes of users for that airport:

IFR OPERATIONS PER HOUR

Class of user	John F. Kennedy Airport	La Guardia Airport	Newark Airport	O'Hare Airport	Washington National Airport
Air carriers except air taxis	70	48	40	115	40
Scheduled air taxis	5	5	10	10	5
Other	5	5	10	10	12

(b) The following exceptions apply to the allocations of reservations prescribed in paragraph (a) of this section.

(1) The allocations of reservations among the several classes of users do not apply from 12 midnight to 6 a.m. local time, but the total hourly limitation remains applicable.

(2) The allocation of IFR reservations for air carriers except air taxis at the John F. Kennedy Airport is 80 IFR reservations per hour from 5 p.m. to 8 p.m.

(3) The allocation of 40 IFR reservations for air carriers except air taxis at the Washington National Airport does not include charter flights, or other non-scheduled flights of scheduled or supplemental air carriers. These

flights may be conducted without regard to the limitation of 40 IFR reservations per hour.

(4) The allocation of IFR reservations for air carriers except air taxis at La Guardia, Newark, O'Hare, and Washington National Airports does not include extra sections of scheduled air carrier flights. These flights may be conducted without regard to the limitation upon the hourly IFR reservations for air carriers except air taxis at those airports.

(5) Any reservation allocated to, but not taken by, air carrier operations (except air taxis) is available for a scheduled air taxi operation.

(6) Any reservation allocated to, but not taken by, air carrier operations (except air taxis) or scheduled air taxi operations is available for other operations.

Myden Hunt 77
FAA 013.133
 § 93.123

Mr. ANDERSON. Next, we will put four of our colleagues together, Steve Neal, Del Latta, Charles Whitley, and Thomas Ashley. Let us see if we can wrap this up and then go to lunch.

TESTIMONY OF A PANEL OF CONGRESSMEN: HON. DELBERT L. LATTA, OHIO; HON. CHARLES WHITLEY, NORTH CAROLINA; HON. THOMAS L. ASHLEY, OHIO; AND HON. STEPHEN L. NEAL, NORTH CAROLINA

Mr. LATTA. Thank you very much, Mr. Chairman. It will not take me very long. I do not know very much about aviation. I do not know anything about banking airplanes or flying them. I just ride them, but I know something about their convenience and their inconvenience.

I was not one who was up shouting for deregulation because I come from northwestern Ohio. I knew Toledo Airport was going to be adversely affected and was adversely affected by it.

We have now seen United pull out all of its flights coming east out of Toledo. I think we have only four United flights left going west from Toledo. We have seen two other airlines leave since that time. It is typical of many of these smaller airports around the country.

What we are concerned about now is, if this particular FAA ruling goes into effect, we will have, it is estimated, something like 128 less flights coming into Washington.

We now have a very difficult time getting from Toledo to Washington. Air Florida, has come in just recently to give us one flight in the morning into Washington. Since it is one of the later additions, and this is a new flight, if this new FAA proposal goes into effect, Air Florida will probably be forced out to take care of some of its older customers. We do not want to see this happen.

To give you some idea of how difficult it is to get from Washington to Toledo, Ohio, now, I will tell you what happened to me just last weekend. I had to leave here, fly to Columbus, take another airline into Detroit, fly right by Toledo, and then take another airline out of Detroit and fly back to Toledo. I do not think this is very good service, but if this regulation goes into effect, we will not even have this type service.

So I would hope that something can be worked out to pacify these people in the Washington area who seem to be complaining. But there are thousands of people in the country, other than Washington, D.C., who will be affected adversely, if this FAA proposal goes into effect and I happen to be one of them. My good friend, Congressman Ashley, is one of them. Toledo airport is his home airport, and we use it quite frequently, and he knows whereof I speak.

Thank you, Mr. Chairman.

Mr. ANDERSON. Mr. Whitley, from North Carolina.

Mr. WHITLEY. Thank you, Mr. Chairman.

First of all, I would like to ask permission to offer for the record a statement from my colleague, Ike Andrews, of North Carolina.

Mr. ANDERSON. It will be made a matter of the record. No objection, so ordered.

[The following was received for the record:]

PREPARED STATEMENT OF IKE ANDREWS, FOURTH DISTRICT, NORTH CAROLINA

I want to express my opposition to the adoption of any policy by the Federal Aviation Administration which will reduce service between Raleigh/Durham and Washington National Airport. In my view, the primary role of Washington National should be to provide service to nearby cities such as Raleigh/Durham. If any reduction in service is required, it should be accomplished by transferring long haul flights to Dulles or Baltimore-Washington National Airports.

The FAA Policy should contain a specific provision to preserve for cities like Raleigh/Durham and other cities within about 300 miles of Washington National the identical number of slots that are available for this service today.

It is hard to overstate the importance of Washington National service to Raleigh/Durham. In 1979, flights between Raleigh/Durham and Washington National attracted over 340,000 passengers. This amounts to over 900 passengers a day. The demand for this service was so great that the flights had an average load factor of over 70 percent.

There is no way that this service can be reduced without completely destroying the quality of air service at Raleigh/Durham. Under the proposed FAA Policy, certificated slots are reduced by about 20 percent. In addition, new service to Washington National for cities such as New Orleans and Kansas City is authorized. The slots for these services will, of course, be taken from existing service. These rules will reduce Raleigh/Durham service by at least 25 percent. This means that the remaining flights will be forced to operate with load factors of 93 percent to carry existing traffic.

This is obviously impossible. It is apparent that a large number of Raleigh/Durham passengers who now fly to Washington National will be deprived of that service and will be seriously inconvenienced.

Service to Washington National is also important for Raleigh/Durham passengers connecting at Washington National for other cities. In fact, about two-thirds of our passengers make these connections. There is no question of the importance of connecting service at Washington National. In fact, there are more Washington National connecting passengers than there are total passengers at either Dulles or BWI. The number of connecting flights at Washington National far exceeds the connecting flights at the other two airports. Again, the maintenance of existing service between Raleigh/Durham and Washington National is essential for quality air service at this city.

I urge the Committee to make clear its position that Washington National would be maintained as the short haul airport for the Washington area, and that the FAA Policy contain such specific provisions as are necessary to insure the preservation of service to nearby cities.

Mr. WHITLEY. In my own behalf, I would like to suggest that the committee might give attention to the often-used and very true axiom that, "If it ain't broke, we don't fix it."

Washington National has been providing reasonably good service, with exceptions like my colleague, Mr. Latta, just referred to, into cities within 650 miles or so, under the present situation. The proposal of the FAA to reduce flights at Washington National by almost 20 percent, while at the same time authorizing new service to cities within 1,000 miles of the airport is a step in the wrong direction. In my view, Washington National should be used to provide short- and medium-haul service, and Dulles Airport and Baltimore-Washington International should handle the long-haul flights.

Any FAA policy should recognize the unusual importance of service at Washington National for nearby cities. I know how important that service is for Jacksonville, N.C. Washington is Jacksonville's second-largest destination, and service is even more essential for Jacksonville air passengers who connect at Washington National for other cities. In fact, Jacksonville's connecting traffic is almost seven times as much as its local traffic, amounting to over 120 passengers a day. This, I think, is very important, Mr. Chairman. Any FAA policy to reduce slots at Washington National

should recognize the basic difference between reducing service to big cities like Chicago and Miami and reducing service to smaller cities like Jacksonville, N.C. A city like Chicago has 17 roundtrips a day, while Miami has 10. If the number of slots for these cities were cut by 20 percent, there would still be 13 roundtrips a day to Chicago and 8 roundtrips to Miami. And at these cities, the present level of seats could be maintained by the use of wide-bodied jets to Chicago and Miami.

But there is no way that Jacksonville's service to Washington National can be reduced. It has two nonstop roundtrips to Washington, and any reduction in slots available to Jacksonville, N.C. would produce a completely unacceptable level of service, far below minimum levels. In my opinion, Washington National's most important role is to serve cities like Jacksonville, and for those cities, Washington is an important destination. The cities are nearby, so that service to other area airports produces an unacceptable increase in ground time in relation to air time.

Washington National is a connecting airport, providing access from that city to the Nation's air transportation system, and since the cities generally have a smaller number of flights to Washington National, any reduction in service would reduce frequencies below the acceptable minimum. I think the testimony of our colleague, Mr. Latta, underscores that point.

The FAA policy should preserve Washington National as an airport for nearby cities. While there may be other ways of accomplishing this objective, it seems to me that the proposal of Piedmont Airlines to maintain all slots for all existing flights to cities within 300 miles of the airport, provides one method of assuring that Washington National fulfills its primary role.

In any event, I hope that in exercising your oversight function, the subcommittee will support the policy of utilizing Washington National as the airport for nearby cities and maintaining existing service to Washington National for these cities.

Thank you.

Mr. ANDERSON. Thank you, Mr. Whitley.

The next witness is Steve Neal.

Mr. NEAL. Thank you, Mr. Chairman, and thank you for the opportunity to testify on this issue. I would also like to testify in opposition to the proposed FAA policy to cut back airline service at Washington National by about one-fifth.

Service to Washington National is of crucial importance, not only to air travelers from Winston-Salem in my home district, but to air travelers throughout North Carolina.

The importance of this service is evidenced by the fact that in 1979 there were over 700,000 passengers a year, or over 1,900 passengers a day, between North Carolina and Washington National. Most of these passengers came from the North Carolina cities which are within 300 miles of Washington National. Moreover, over half of the North Carolina passengers are connecting passengers, who can only be well-served by the large number of connecting flights at Washington National.

The proposal of the FAA to eliminate 1 out of 5 flights at Washington National is bound to have a crippling effect on service to my State. We will also lose additional service through a new

perimeter rule, which will permit service to any city within 1,000 miles. New service to these more distant cities inevitably means less service to nearby cities in States such as North Carolina, Virginia, and West Virginia.

Service at Washington National is not primarily a local concern. Washington National is the most important airport between New York and Atlanta. Service at Washington National is the key ingredient in the air service pattern for all the States near the Nation's Capital.

I would not propose to increase the slots, but they certainly should not be reduced particularly with the introduction of new quieter aircraft. In my view, the FAA should not tamper with existing service at Washington National. It should not reduce flights. It should not open up Washington National to new, distant markets. Most importantly of all, it should preserve Washington National as the airport for short- and medium flights to cities in nearby States such as North Carolina.

This service is so important that even if the FAA goes ahead with its program to cut service overall, it should adopt special provisions to maintain existing service levels to shorten medium-haul markets such as North Carolina cities.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you very much for your presentation.

Our next witness is Hon. Thomas Ashley from Ohio. This is an Ohio-North Carolina meeting here. I was looking at the map, and you are both almost identical in proximity, as far as the perimeter is concerned.

Mr. ASHLEY. We have very much the same problem, too, Mr. Chairman.

I want to express my appreciation for the opportunity to appear this morning to express my opposition to the recent efforts of the FAA to reduce the number of airline operations for certified carriers at National Airport.

I am aware, of course, Mr. Chairman, that the FAA has also proposed changes for National involving the use of wide-body aircraft, a perimeter rule governing the nonstop length of flights to National, and the number of passengers served annually there.

It is my purpose to confine my remarks at this juncture to the issue of operating hours and the number of permissible hourly slots for certified carriers.

In my judgment, the rule proposed by the FAA is unduly restrictive, and its adoption would severely impact those carriers who have been going into smaller and middle-sized cities and picked up new and innovative service to Washington, especially since the advent of airline deregulation. In fact, I believe the FAA proposal could well force these carriers to make a choice between their established flights, with a clear profit history, and those flights still in the developmental stages. Precisely such a situation exists in my home city of Toledo, Ohio, as has been described by my colleague, Del Latta.

Since airline deregulation, Toledo Express Airport has lost considerable service, including its only prederegulation link to Washington. In the wake of deregulation, Air Florida moved into this breach and established daily, nonstop, roundtrip service between

Toledo and Washington. After several months, and in the face of intense competition from Detroit's Metro Airport, Air Florida is now beginning to turn the corner on making this flight a profitable one.

The rule such as that proposed by the FAA, however, would effectively kill this plan off before it really had a chance to get started. I am advised that overall, the FAA-proposed reduction of the 128 flights per day at National would mean the displacement of over 5,000 passengers and would impact over 100 cities.

Mr. Chairman, I am sensitive to the need for noise relief at the urban airports, especially at Washington National. But I believe that the rule that the FAA has come up with is overly rigid and does not adequately take into account the needs of airports, carriers, and passenger service. A more carefully structured proposal would match or exceed the environmentally ameliorative effect of the FAA proposal, without causing the severe disruptions in the Nation's air transport network.

Just such a proposal has been advanced by the Air Transport Association, and both the FAA and this committee, it seems to me, would do well to give it careful review.

ATA has sought to strike an effective balance between the environmental considerations and the service needs. They have proposed reductions even beyond those set forth by the FAA during those hours when ambient noise levels are normally low, such as weekends and early evening hours, or on weekdays.

Conversely, the ATA has proposed modest increases in the number of air carrier slots during those periods when noise levels are already high.

The FAA, on the other hand, has adopted a proposal which calls for a rigid hourly reduction from 40 to 36 slots for certified carriers, and for a rigid enforcement of National's closing time.

It is interesting to me that overall, ATA's proposal has allowed for a significant reduction in certified carrier operation, and they have provided for substantial increases in commuter operations, thus achieving two of the FAA's primary goals. In fact, by spacing air carrier operations more carefully throughout the day and week, ATA actually manages to permit fewer weekly operations than the proposal set forth by the FAA.

In summary, Mr. Chairman, I think the ATA proposal is more realistic, and it certainly is more flexible. ATA has properly taken into account the fact that any scarce resource should be allocated with a view toward achieving the most efficient and publicly oriented use of that resource. They have remained sensitive to the concerns of residents in National's flight path, and they have crafted a proposal, it seems to me, that will not leave the Toledos of this country without adequate air service.

I appreciate your indulgence in listening to my objections this morning. I will appreciate even more if the FAA has also been listening to me and my colleagues this morning and takes some curative action in formulating its final rule with respect to D.C. National Airport.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, for your presentation. Do the panel members favor keeping the existing 650-mile perimeter rule, even if there is no reduction in flights?

Mr. WHITLEY. Yes.

Mr. ANDERSON. I think that "yes" came from all four of you. Yesterday we heard testimony that development of I-66 and the Dulles access road, which will be completed in the next few years, will make it possible to travel on interstate highways from Dulles Airport to downtown Washington and probably save approximately 15 minutes of travel time. Would these improvements make travel to Dulles substantially more acceptable to your constituents?

Mr. WHITLEY. May I respond, Mr. Chairman? We would still have the problem of missing all the connecting flights at Washington National, unless there a total change in the scheduling of all the carriers. Our need for flying into Washington National is not simply to get to Washington, D.C. A great majority of the passengers who fly from eastern North Carolina to Washington are going on to New York or Chicago or somewhere else.

So that would not meet our problem. It is not just a matter of me or my colleague Steve Neal or my colleague Del Latta being able to get to the airport in, say, 20 minutes instead of 40. That is not our problem. Our problem is that our constituents who are flying into Washington need to connect with other flights.

Mr. ANDERSON. If there were more connecting flights out of Dulles, then, maybe your constituents would just as soon go there, is that it?

Mr. WHITLEY. Well, it would certainly make it a great deal more convenient out of Dulles, but there would have to be a tremendous change in the overall scheduling to make it as convenient to fly to Dulles, in addition to just making the time a little shorter in the trip out.

Mr. ANDERSON. One part of the FAA's proposal is to increase the hourly slots for commuter operations from the present 8 per hour to 12 or 15 per hour. Would this increase be of any value to your constituents?

Mr. WHITLEY. Again, if I may respond, it would not make any difference to ours. We do not really have anything classified as commuter flights anyway, from eastern North Carolina.

Mr. LATTI. It would not help us a bit.

Mr. ASHLEY. No; there is no commuter service from the areas of Ohio that we represent to Washington National.

Mr. ANDERSON. Yesterday we heard testimony that under the present policies for National, the airlines schedule about 18 flights at 9:59 p.m., and that it takes until 10:30 or later for these flights to be completed, and this is a source of substantial annoyance to the residents near the airport.

The FAA now proposes to allow no operations after 9:30 and to permit only 18 operations between 9 and 9:30. I would appreciate your comments on this proposal.

Mr. WHITLEY. Mr. Chairman, I do not believe many people go to bed before 11 at night. I think if we took the actual practice and legitimized it, but were rigid about cutting it off at roughly 11 or 10:50, or whatever time it takes, we could do away with this 9:59 departure and bunching flights. That would be my recommenda-

tion. But I really do not believe that 30 minutes is going to make that much difference.

Mr. LATTA. Mr. Chairman, may I comment?

Mr. ANDERSON. Yes, Mr. Latta.

Mr. LATTA. I think it would do these proposed regulators well if they would go out and listen to some of the comments of the people in the country who pay their salaries. This is more than a one-way street. They are just thinking about people situated around Washington National Airport, who knew that there was an airport there before they ever moved into the area. We are concerned about people, 215 million people who live elsewhere in these United States who want to get into their Nation's Capital, and who will be adversely affected and inconvenienced if these regulations go into effect. The regulators ought to go out and talk to some of these people and see what they think about their proposals. They only hear from the people around here.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you, Mr. Chairman.

I do not have any questions, but I want to say that if I understood you correctly, and I think I do, that I am in agreement with the presentation that you have made. I thank all of you for being here and adding some credence to not trying to cut down this airport and virtually shut it down and send everybody into Dulles just because they are not doing good business, or up to Baltimore and help their income a little bit. We have to take care of the people who do have to commute to Washington; even though some of Charley's people may be going on someplace else, an awful lot of people have to come here now to deal with the bureaucracy, and we need to make it as convenient for them as we can.

I appreciate your contribution.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you very much, gentlemen, for your presentation.

I do have a statement by Harley Staggers that he would like to have made a matter of the record. No objection; so ordered.

[The following was received for the record:]

CONGRESS OF THE UNITED STATES,
HOUSE OF REPRESENTATIVES,
Washington, D.C., June 11, 1980.

To: Hon. Glenn M. Anderson, Chairman, Subcommittee on Aviation, House Public Works and Transportation Committee, Rayburn House Office Building, Washington, D.C.

From: Hon. Harley O. Staggers, Second District, West Virginia, Rayburn House Office Building, Washington, D.C.

Subject: FAA Policy at Washington National Airport.

I want to express my firm opposition to the FAA proposal to cut service by scheduled airlines at Washington National Airport by 20 percent, and at the same time to permit new service to far away cities such as Kansas City and New Orleans.

The State of West Virginia is heavily dependent on good service to close in Washington National. This service is used by a large number of West Virginians who are visiting Washington or who connect at Washington National for service to other cities.

Despite the importance of this service to West Virginia, there are only a limited number of flights to Washington National. For this reason, any reduction in service will produce serious inconvenience. Yet, under the new FAA Policy, there is the prospect of a reduction of 20 percent in the available slots, plus an additional loss of service occasioned by the use of slots by cities such as Kansas City and New Orleans. Thus, we face the unusual prospect of more long haul services at Washington

National while short haul services are being transferred to Dulles and Baltimore-Washington International Airports. I do not think this makes sense.

I hope the Committee will make it clear to the FAA that any Policy should have as a primary objective the preservation of Washington National as a short haul airport, providing service to cities of nearby States such as West Virginia.

Respectfully submitted,

HARLEY O. STAGGERS, M.C.

Mr. SNYDER. Mr. Chairman, I ask unanimous consent that a statement of J. Kenneth Robinson, of the Seventh District of Virginia, be inserted at this point in the record.

Mr. ANDERSON. Without objection, so ordered.

[The following was received for the record:]

CONGRESS OF THE UNITED STATES,
HOUSE OF REPRESENTATIVES,
Washington, D.C., June 11, 1980.

Hon. GENE SNYDER,

Ranking Minority Member, Subcommittee on Aviation, Committee on Public Works and Transportation, U.S. House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR GENE: I regret that meetings of the Committee on Appropriations and of its Subcommittee on Defense, on which I serve, prevent my being present at the hearing of the Subcommittee on the Department of Transportation's proposed policy for Metropolitan Washington Airports.

It would be appreciated if you would receive the enclosed short statement for the record of the hearing.

Sincerely,

J. KENNETH ROBINSON.

Enclosure.

STATEMENT OF REPRESENTATIVE J. KENNETH ROBINSON OF VIRGINIA

Mr. Chairman, I appreciate this opportunity to submit a short statement in connection with the Subcommittee's consideration of a proposed policy of the Federal Aviation Administration, Department of Transportation, as to future operation and development of aviation services at Washington National Airport and Dulles International Airport.

As a former member of the Dulles International Airport Commission, an agency of the Commonwealth of Virginia, I have had a long-standing concern over the persisting under-utilization of this fine air terminal. I support in principle, therefore, the indicated intent of the Federal Aviation Administration to shift some of the scheduled service from Washington National Airport to Dulles. In view of the substantial excess capacity presently available at Dulles, it seems clearly indicated that the heavy pressure on National should be relieved for considerations of air safety and environmental impact.

In any shift of light access slots to Dulles, inconvenience to passengers in the matter of time of travel to and from an airport would be minimized, on a relative basis, if the emphasis were on movement of long-haul flights away from National.

An examination of the FAA proposal suggests to me, however, that existing and projected short-haul service needs at National would be disadvantaged by the access slot formula. I have in mind, in particular, scheduled air carrier service between National and points within a 300 mile radius. I cite as an example the estimate of Piedmont Airlines, a carrier which provides the only service of its class to a number of Virginia cities, that failure to maintain the current level of slots for non-stop certificated service to cities within 300 miles would result in a 47-percent loss of service to short-haul cities on its routes.

It also has been pointed out that the proposed admission of so-called "jumbo" jets, presumably flying long-hauls, would tighten the squeeze on short-haul service availability by quickening the approach to the planned annual passenger ceiling at the airport.

I recognize that the FAA plan includes substantial increases in slots for commuter airlines, but I question the advisability of doing this at the expense of certificated carrier service which is generating economically-acceptable levels of traffic.

In the interest of a balanced treatment of the various elements of public convenience and necessity, therefore, I urge the Subcommittee to support maintenance of at least the existing number of slots for non-stop certificated services to cities within 300 miles of Washington National Airport.

I urge, further, that the Subcommittee give consideration to means of insuring reliable and convenient air service between Washington National Airport and communities in the 300 mile radius when such communities are deprived of non-stop certificated carrier service by election of the carrier to abandon the route. In such circumstances, the arrival and departure slots at National thereby vacated should be reserved for any other certificated carrier willing to provide service over the route, or, if none were to come forward, for a qualified commuter airline willing to provide service on a regular basis, to the affected communities.

I believe that this protection for short-haul service to and from National can be provided in a manner consistent with the desirable objectives of reducing the present dangerously excessive overall air traffic pressure on that airport and making more efficient use of underutilized Dulles.

Mr. ANDERSON. Well, apparently, that completes our hearings for the day. We will now stand in recess until 10 on the 19th.

[Whereupon, at 1:12 p.m., the subcommittee recessed to reconvene Thursday, June 19, 1980, at 10 a.m.]

DOT/FAA PROPOSED NEW POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

THURSDAY, JUNE 19, 1980

**HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON AVIATION,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
Washington, D.C.**

The subcommittee convened at 10:10 a.m., in room 2167, Rayburn House Office Building, Hon. Glenn M. Anderson (chairman of the subcommittee) presiding.

Mr. ANDERSON. The meeting of the Subcommittee on Aviation will come to order.

Our first witness is the Honorable Peter Peyser from New York. The floor is yours.

TESTIMONY OF HON. PETER PEYSER, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF NEW YORK

Mr. PEYSER. Mr. Chairman, I thank you for the opportunity of appearing before you, and also for extending these hearings so that we can hear from many other people who are quite interested in these proposed regulation changes.

Understanding the schedule, Mr. Chairman, I will be quite brief in my statement.

Basically, Mr. Chairman, my concern, as I understand the proposed regulations, is that the effect of the regulations would be a reduction in air service to National Airport. In my own area of Westchester County, which encompasses a population that nearly equals a million people, the air service from Westchester County Airport was suspended back in November of 1979 to Washington when Allegheny Airlines withdrew from the area. After a great deal of searching and working with the agencies involved, Air Florida, starting on April 28, came in to pick up the service and actually enhance the service that Allegheny had been providing for a great many years for the Westchester area.

The implications, Mr. Chairman, of the proposed regulations would in effect, if followed out, eliminate Air Florida as an effective carrier from Westchester County. And I would strongly urge, Mr. Chairman, that your questioning of FAA, when this issue comes before you, be directed toward carriers such as Air Florida, providing services for communities such as Westchester County. I am sure there are many others who are involved—who will lose access to the Washington area unless they have to drive, in our area, to La Guardia Airport, to seek that service.

I find that the reasons being advanced by the FAA, namely noise and the potential question of safety, are really quite unrealistic. If

we are going to restrict airports throughout the country on noise levels that have, by legislation, been contained and controlled over the last several years, and try and refine it even further and cut down flights because of this, we are going to end up closing or cutting back on major airports all over the country. We need to continue, to promote this kind of travel as a convenient method of commuting, to various areas around the country and not to be restricting it.

I also read in the report the question of safety as a potential problem. I listened to testimony the other day before your committee where it was pointed out that there are hazardous conditions and a statement was made by one of our colleagues about how would we feel in the Congress if a crash occurred at National Airport. Well, we would feel terrible if a crash occurred at National Airport or at any other airport that I can think of. But National Airport, to my understanding, has one of the longest safety records for not having any crashes of any airport around the country.

Obviously, any time you fly there are potential hazards, just as when you are driving a car, there are potential hazards. But I think the record is very clear on this issue. It is my definite hope that these regulations will not be imposed, that the committee will do what it can in its power to halt this effort, and if we have to, then, in the Congress we would have to take a legislative action to change these regulations as we under law are authorized to do.

So Mr. Chairman, I appreciate your listening to me on this. I am representing literally thousands and thousands of people who look to this airport in Westchester County—to business, jobs, everything that is tied into having this outreach that we now have, and I hope that the efforts of the FAA in this area will be defeated. I appreciate your listening to me, Mr. Chairman.

Mr. ANDERSON. We thank our colleague for a very fine statement.

Mr. PEYSER, have the airlines serving your district told you that the FAA proposal would result in reduction of service between your district and the Washington area, and if so, were they specific as to the flights they would eliminate?

Mr. PEYSER. Yes. They indicated clearly to us that if these regulations were imposed, that the flights and service originating as of April 28, 1980 from the Westchester County Airport would in all likelihood, as their statement said, have to be terminated, because to seek any other air service into the Washington area, such as Dulles, would be totally impractical as far as attracting customers from our area.

Mr. ANDERSON. Now, one part of the FAA's proposal is to increase the hourly slots for commuter operations from the present 8 per hour to 12 or 15 per hour. Would this increase be of any value to your constituents?

Mr. PEYSER. Only if we had airlines that were flying those particular routes. The point is, the only access we would have, as has been proven in the past, has been La Guardia, if Westchester's operation was basically shut down.

So the increase in slots sounds interesting, but the practicalities of it are, if we have no airlines flying it, it is not going to mean anything to us.

Mr. ANDERSON. Last week, we heard testimony that under the present policies for National, the airlines schedule about 18 flights at 9:59 p.m., and that it takes until 10:30 or later for these flights to be completed, and this is a source of substantial noise for the residents near the airport.

The FAA now proposes to allow no operations after 9:30 and to permit only 18 operations between 9 and 9:30. I would appreciate your comments on this proposal.

Mr. PEYSER. Well, Mr. Chairman, I recognize the problem, and I am not without concern for residents in the area, as I am concerned about residents in my own area at the airport and at La Guardia.

I live in Washington, incidentally, in a direct line with the airport; I am over in Southwest, and I both watch and hear the planes every night, and frankly, it is one of those things that you do become accustomed to, and does not become a major, major problem—I think the problem would be far greater if you eliminate those flights. And I think it is not serving our Capital well, and it is not serving the people of the country well to do that.

Mr. ANDERSON. Testimony last week suggested there is no justification for having the Federal Government manage National and Dulles Airports, and we should follow the same practice as other cities, and have the airports managed by the local jurisdictions. Do you have any position on this proposal?

Mr. PEYSER. Well, Mr. Chairman, I have frankly never been enthusiastic of the Federal Government operating these airports if they can be operated by private operators. I do believe the Federal Government has to have a definite interest in how they are operated, on a total area, which I will not get into. I have a real problem with some of the things that are happening at National Airport, and some of the ways I believe consumers are being ripped off on arrival with the additional charges that have been put on cab fares at National Airport, which I understand has been done with the approval of the Government operation—that is not what the hearing is on today, but I would certainly support, if private enterprise were there and capable and wanting to do this, under the controls, then I have no objection.

Mr. ANDERSON. Thank you.

Mr. Snyder?

Mr. SNYDER. I did not have any questions, but in response to that last one, the chairman's question was not to turn it over to private enterprise; it was to turn it over to local authorities.

Mr. PEYSER. I beg your pardon.

Mr. SNYDER. And if you turn it over to local authorities, my friend, if you get one slot now—

Mr. PEYSER. I beg your pardon. My understanding of the question, Mr. Chairman—and I am glad my good friend brought that out—was turning it over to a private operation rather than under Government control. Now, I would certainly not be interested in having the local government set the regulations on the time of arrival because I think the political pressures there would be such that it would be an event to see planes come into National Airport.

Mr. ANDERSON. Are there further questions?

[No response.]

Mr. ANDERSON. Thank you very much, Mr. Peyser, for a very excellent presentation.

Mr. PEYSER. Thank you very much, Mr. Chairman.

Mr. ANDERSON. Our second witness this morning will be Robert J. Aaronson, the Associate Administrator for Airports, Federal Aviation Administration. He will be accompanied by James A. Wilding, Director of the FAA's Metropolitan Washington Airports, and Clark Onstad, the Chief Counsel for the FAA.

Again, we do have your prepared statement, Mr. Aaronson, and it will be made a matter of record.

[The statement referred to follows:]

PREPARED STATEMENT OF ROBERT AARONSON, ASSOCIATE ADMINISTRATOR FOR AIRPORTS, FEDERAL AVIATION ADMINISTRATION

Mr. Chairman and members of the subcommittee, I welcome the opportunity to appear before you today to discuss the Department of Transportation's proposed policy governing Washington National and Dulles International Airports. I also appreciate your expressed interest in discussing the adequacy of police protection at the Airports and the adequacy of current provisions for funding maintenance at the Airports as well. With me are Jim Wilding, Director of FAA's Metropolitan Washington Airports, and Clark Onstad, FAA's Chief Counsel.

Before discussing our proposed policy, I want to point out that the period for public comment has closed for this proposal. We are concerned that our appearance today not be misconstrued as a prejudgment of the final rulemaking. I want to emphasize that a final rule will be promulgated only after a full analysis of all public comment received during the notice period. What we would like to do today is to explain our proposed policy and provide the Subcommittee with our rationale for that proposal. We agree with the Subcommittee that there should be no inconsistency with the Administrative Procedure Act in offering those explanations.

Since our proposed policy for the Metropolitan Washington Airports has received wide distribution, I will quickly highlight the purpose of the policy effort and features of the policy proposal.

The Department of Transportation has, for almost 10 years, been seeking to establish an appropriate policy to guide the FAA's management and operation of National and Dulles Airports. Once a policy defining a role for each airport is in place, it will then be possible for the Department to move ahead with long overdue improvements to the facilities at National, while continuing to make timely improvements to Dulles.

It's important to recognize the extent of public involvement there has been in shaping a policy for the Airports. During the past decade, we have met on countless occasions with virtually every segment of the community. We have met repeatedly with representatives of the aviation community, the Council of Governments, the National Capital Planning Commission, elected officials, and citizens groups.

For example, in 1977, we held six public hearings in which we heard from hundreds of persons about local noise problems. In 1978, when we issued a draft Environmental Impact Statement concerning a proposed Metropolitan Airports Policy, we distributed that draft throughout the community, as well as to affected persons in other communities. We held four public hearings, attended by approximately 400 persons. We received nearly 1,000 written comments from local and state governments, from Members of Congress, from chambers of commerce, from the aviation industry, from citizen's groups, and from the general public. All those comments were assessed before our current proposal was issued. With respect to the current proposed policy, we have held three public hearings. Those hearings were attended by nearly 300 people. We have received approximately 500 written comments on the proposal, all of which will be carefully reviewed before a final policy is issued.

When you consider all the input we have received over the years in formal and informal sessions, the hundreds of pages of transcripts we have reviewed, the 1,500 written comments we have received in response to our proposals, and the continuing dialogue we have had with affected persons, it is apparent that there has been substantial participation by the public in formulating a policy for the Airports.

I'd like to focus briefly on the need for a policy. The Washington/Baltimore area is served by three major airports, two of which—National and Dulles—are operated by the Department of Transportation. The third, Baltimore-Washington International

al, is operated by the State of Maryland. While Dulles and Baltimore-Washington International are relatively free of significant problems, National is not.

National handles the majority of air passengers in this region—almost 7 out of every 10. That has created substantial noise problems in portions of the region. Many residents, and their local governments as well, see the concentration of the region's flight activity at National as an unnecessary and unwarranted burden, particularly with the availability of the area's two other larger and relatively underutilized airports.

The facilities at National, some of which are 40 years old, have become seriously overburdened by the heavy passenger volume, with consequent declines in the service provided to airport users. Portions of the terminal complex, including the entire North Terminal and the utility systems, are in need of major redevelopment. The present airport road network is not adequate to handle the demands being placed on it, and there are more efficient ways to deal with the airport traffic.

Automobile parking facilities are limited, and major facility changes are needed to make the Metro station convenient to the terminal. Many of the Airport's facilities are simply outdated. There is little need to elaborate on the need for substantial improvements at National since that need is readily apparent to anyone who has been there.

Over the next decade, the number of air passengers in this region will increase more than 60 percent over today's level. It is imperative that full consideration be given to directing much of that future growth away from National to Dulles and Baltimore-Washington Airports. This will enable us to eventually rebuild National into a facility in which we can all take pride. Attempting to accommodate the majority of future growth at National will only result in a worsening noise problem, continued deterioration in the levels of service offered to air passengers, more terminal and roadway congestion, and the continued physical deterioration of National's landside facilities.

Let me quickly sketch out the major elements of the proposed policy.

ROLE OF DULLES

Our policy proposes that Dulles will continue to provide all types of air transportation service to the Washington area, with capacity added as needed. The original purpose of the Dulles Access Road will be retained by permitting only limited exceptions to the longstanding practice of allowing the use of the road only for access to the Airport. We will also undertake to promote and improve public transportation to the Airport.

GROWTH AT NATIONAL

We are proposing to control future passenger growth at National and have proposed a permanent limit on the number of annual passengers served at 18 million. Comments suggesting other limits have been received and are being seriously evaluated. The rate of growth would be reduced immediately by a reduction in the number of slots allocated to certificated air carriers at National.

REDUCTION IN OPERATING SLOTS

We have proposed a continuation of the 60 total IFR slots at National per hour. Within that total of hourly slots, we would limit certificated air carriers to no more than 36 schedules (whether take-off or landing) per hour between 7:00 a.m. and 8:59 p.m.; and no more than 18 between 9:00 p.m. and 9:30 p.m. Commuter air carrier schedules would be increased from the present eight hourly slots to either 1) 12 per hour between 7:00 a.m. and 8:59 p.m. with six between 9:00 p.m. and 9:30 p.m., or 2) 15 operations between 7:00 a.m. and 8:59 p.m. with eight between 9:00 p.m. and 9:30 p.m. If the commuter slots are increased to 15, three operating slots would be deducted from the allocation to the general aviation user class.

PERIMETER RULE

We have proposed the formal definition of a nonstop service perimeter at National to preserve the Airport's medium and short-haul status. We have proposed two alternatives for the perimeter rule: (1) The existing 650-mile limit with a continued exemption of the seven grandfathered cities located beyond that limit but within 1,000 miles; or (2) A 1,000-mile limitation applying to all cities equally.

REDUCTION IN HOURS OF OPERATION AT NATIONAL

We are proposing that the airport be closed to all traffic after 10:30 p.m. and before 7:00 a.m., except for emergencies. Certificated and commuter carriers would be permitted to schedule operations from 7:00 a.m. until 9:30 p.m.

USE OF WIDE-BODY AIRCRAFT

We are proposing that the current policy constraint against two- and three-engine wide-body aircraft at National be removed. The prohibition on four-engine jet aircraft operations at National would continue. Until there is a redevelopment of the Airport's facilities, the final decision on the use of wide-body aircraft by any operator would be made by the Director of Metropolitan Washington Airports. Before those decisions could be made, an evaluation of the requesting air carrier's proposed operating plan would be undertaken and the ultimate decision based upon the proposed operation's compatibility with the Airport facility.

I should add that the FAA's Office of Flight Operations evaluated the operation of wide-body aircraft at National from the safety perspective. Actual flights, using the DC-10 and A-300, were monitored and evaluated by FAA inspectors to consider a variety of factors such as approach acceptability and terminal area maneuverability. Those wide-body operations were concluded to be safe. Other wide-body aircraft would be similarly evaluated to assure safe operation before permission would be granted to use the Airport.

Those are the elements of the policy proposal. Now, let me expand on what they will mean.

The curfew would lessen the impact of noise at National by curtailing operations during those hours when the annoyance from noise is greatest or, put another way, when the ambient noise is lower. The introduction of wide-bodied aircraft at National will permit a shift in service to more environmentally acceptable and more fuel efficient aircraft. Efforts to increase the acceptability of Dulles as an alternative to National will reduce the burden placed on National and its neighbors. Reductions in the number of hourly certificated carrier slots, coupled with a cap on passenger traffic at National, will provide future environmental relief.

Our policy deals with the demand of smaller communities within 650 miles for service to Washington. Commuters are available in many cases to meet that demand, but with the slot allocations in effect at National there have not been adequate slots to permit commuters to provide the small community service. The proposed increase in the number of commuter slots would enable greater service to Washington from smaller communities.

Increased commuter slots would reinforce substantially the policy decision that National should remain a short- and medium-haul airport, with Dulles International and Baltimore-Washington International available for long-haul domestic or international flights. Dulles and BWI have plenty of capacity available to meet added flights that may be occasioned by reduced certificated carrier slots at National the next few years.

The adoption of a perimeter rule, thereby codifying in regulations the existing practice at National or one similar to it, furthers the policy decision to preserve the short/medium-haul of the airport by formalizing the perimeter rule. The 650-mile rule with the seven exceptions, if adopted, would merely ratify a practice in effect at National since the 1960's the 1,000 mile perimeter rule responds to the concerns that permitting nonstop service to some cities beyond 650 miles but within 1,000 miles discriminates against other cities similarly situated but lacking "grandfather" rights.

I would like to point out to the Subcommittee that FAA's Metropolitan Washington Airports are government operations that are currently returning revenues in excess of costs to the Treasury. There are reasons for this. First, we operate the Airports as efficiently as possible, using business as well as public service principles. We provide a service and we charge for that service. Second, revenues from the Airports are deposited in the Treasury while funds for capital improvements must be appropriated. We have not made significant capital improvements at National in recent years.

In anticipation of future investments at the Airports, the Department of Transportation has under review the feasibility of different financing mechanisms for the Airports. No decision has yet been reached as to whether a different means of financing might be more desirable than the current approach. However, the subject is receiving close scrutiny, and is but one measure of the importance we attach to improving the future operations of our Metropolitan Airports.

As for the Subcommittee's interest in the adequacy of FAA's airport police, this is a subject that has been of long-standing concern to us. Over a period of years, we

have had difficulty in recruiting and retaining high quality police officers at the Airports. While this problem has not been solved, the staffing differential provision of the Administration's pay reform proposal would be instrumental in helping to solve our problem as well as problems experienced by other Federal agencies employing law enforcement personnel. In the interim, we are exploring with the Office of Personnel Management other means of improving our ability to recruit and retain well qualified police officers.

Mr. Chairman, that completes my prepared statement. My associates and I would be pleased to respond to questions you may have at this time.

Mr. ANDERSON. Please proceed.

TESTIMONY OF ROBERT J. AARONSON, ASSOCIATE ADMINISTRATOR FOR AIRPORTS, FEDERAL AVIATION ADMINISTRATION, ACCOMPANIED BY JAMES A. WILDING, DIRECTOR, METROPOLITAN WASHINGTON AIRPORTS, FAA, AND CLARK H. ONSTAD, CHIEF COUNSEL, FAA

Mr. SNYDER. Before we start, so I understand, since the time for public comment is closed, are you going to consider what this committee may or may not decide, or will our decision be precluded from any consideration by virtue of that?

Mr. AARONSON. Mr. Snyder, I believe that the various comments and thoughts that have been coming up at this hearing, and probably will continue to, in most cases are similar to comments which we have already received, and therefore, they most certainly are under consideration at this time and will continue to be so until we make a final judgment.

Mr. SNYDER. I do not consider that responsive to my question. I consider what you said to say, "Since you are not going to say anything different, we are already considering what you are going to say anyway."

Is what this committee does going to be considered by the FAA at all, since comments are closed?

Mr. AARONSON. Yes, it will.

Mr. SNYDER. Thank you.

Thank you, Mr. Chairman.

Mr. ANDERSON. Mr. Aaronson, please proceed.

Mr. AARONSON. Good morning, Mr. Chairman and Mr. Snyder. I welcome this opportunity to appear before you today to discuss the Department of Transportation's proposed policy governing Washington National and Dulles International Airports.

I also appreciate your expressed interest in discussing police protection at the airports and the adequacy of current provisions for funding maintenance at the airports, as well.

With me are Jim Wilding, Director of FAA's Metropolitan Washington Airports, and Clark Onstad, FAA's Chief Counsel.

Before discussing our proposed policy, I want to point out that the period of public comment has closed for this proposal. We are concerned that our appearance today not be misconstrued as a prejudgment of the final rulemaking. I want to emphasize that a final rule will be promulgated only after a full analysis of all public comment received during the notice period.

What we would like to do today is to explain our proposed policy and provide the subcommittee with our rationale for that proposal.

We agree with the subcommittee that there should be no inconsistency with the Administrative Procedures Act in offering those explanations.

Since our proposed policy for the Metropolitan Washington airports has received wide distribution, I will quickly highlight the purpose of the policy effort and features of the policy proposal.

The Department of Transportation has, for almost 10 years, been seeking to establish an appropriate policy to guide the FAA's management and operation of National and Dulles Airports. Once a policy defining a role for each airport is in place, it will then be possible for the Department to move ahead with long overdue improvements to the facilities at National, while continuing to make timely improvements to Dulles.

It is important to recognize the extent of public involvement there has been in shaping a policy for the airports. During the past decade, we have met on countless occasions with virtually every segment of the community. We have met repeatedly with representatives of the aviation community, including airlines and other users, the Council of Governments, the National Capital Planning Commission, elected officials, and citizens groups.

For example, in 1977, we held six public hearings in which we heard from hundreds of persons about local noise problems. In 1978, when we issued a draft environmental impact statement concerning a proposed Metropolitan Washington airports policy, we distributed that draft throughout the community, as well as to affected persons in other communities. We held four public hearings, attended by approximately 400 persons. We received nearly 1,000 written comments from local and State governments, from Members of Congress, from chambers of commerce, from the aviation industry, from citizens' groups, and from the general public. All those comments were assessed before our current proposal was issued.

With respect to the current proposed policy, we have held three public hearings. Those hearings were attended by nearly 300 people. We have received approximately 500 written comments on the proposal, all of which will be carefully reviewed before a final policy is issued.

When you consider all the input we have received over the years in formal and informal sessions, the hundreds of pages of transcripts we have reviewed, the 1,500 written comments we have received in response to our proposals, and the continuing dialog we have had with affected persons, it is apparent that there has been substantial participation by the public in formulating a policy for the airports.

I would like to focus briefly on the need for a policy. The Washington/Baltimore area is served by three major airports, two of which, National and Dulles, are operated by the Department of Transportation. The third, Baltimore-Washington International, is operated by the State of Maryland. While Dulles and Baltimore-Washington International are relatively free of significant problems, National is not.

National handles the majority of air passengers in this region, almost 7 out of every 10. That has created substantial noise problems in portions of the region, impacting residents as well as tourists visiting their Nation's Capital.

Many residents and their local governments as well see the concentration of the region's flight activity at National as an un-

necessary and unwarranted burden, particularly with the availability of the area's two other larger and relatively underutilized airports.

The facilities at National, some of which are 40 years old, have become seriously overburdened by the heavy passenger volume, with consequent declines in the services provided to airport users. Portions of the terminal complex, including the entire North Terminal and the utility systems, are in need of major redevelopment. The present airport road network is not adequate to handle the demands being placed on it, and there are more efficient ways to deal with airport traffic. Automobile parking facilities are limited, and major facility changes are needed to make the Metro station convenient to the terminal.

Many of the airport's facilities are simply outdated. There is little need to elaborate on the need for substantial improvements at National, since that need is readily apparent to anyone who has been there.

Over the next decade, the number of air passengers in this region will increase over 60 percent over today's level. It is imperative that full consideration be given to directing much of that future growth away from National to Dulles and Baltimore-Washington Airports. This will enable us to eventually rebuild National into a facility in which we can all take pride. Attempting to accommodate the majority of future growth at National will only result in a worsening noise problem, continued deterioration in the levels of service offered to air passengers, more terminal and roadway congestion, and the continued physical deterioration of National's landside facilities.

Let me quickly sketch out the major elements of the proposed policy.

Our policy proposes that Dulles will continue to provide all types of air transportation service to the Washington area, with capacity added as needed. The original purpose of the Dulles access road will be retained by permitting only limited exceptions to the long-standing practice of allowing the use of the road only for access to the airport. We will also undertake to promote and improve public transportation to the airport.

We are proposing to control future passenger growth at National and have proposed a permanent limit on the number of annual passengers served at 18 million. Comments suggesting other limits have been received and are seriously being evaluated.

The rate of growth, but not the present number of passengers, would be reduced immediately by a reduction in the number of slots allocated to certificated air carriers at National.

We have proposed a continuation of the 60 total IFR slots at National per hour. Within that total of hourly slots, we would limit certificated air carriers to no more than 36 schedules, whether takeoff or landing, per hour between 7 a.m. and 8:59 p.m., and no more than 18 between 9 p.m. and 9:30 p.m. Commuter air carrier schedules would be increased from the present 8 hourly slots to either 12 per hour between 7 a.m. and 8:59 p.m., with 6 between 9 and 9:30 p.m., or 15 operations between 7 a.m. and 8:59 p.m., with 8 between 9 p.m. and 9:30 p.m. If the commuter slots are increased to

15, 3 operating slots would be deducted from the allocation to the general aviation user class.

We have proposed the formal definition of a nonstop service perimeter at National to preserve the airport's medium and short-haul status. We have proposed two alternatives for the perimeter rule: The existing 650-mile limit, with a continued exemption of the seven grandfathered cities located beyond that limit but within 1,000 miles, or a 1,000-mile limitation applying to all cities equally.

We have proposed that the airport be closed to all traffic after 10:30 p.m. and before 7 a.m., except for emergencies. Certificated and commuter carriers would be permitted to schedule operations from 7 a.m. until 9:30 p.m.

We are proposing that the current policy constraint against two- and three-engine wide-bodied aircraft at National be removed. The prohibition on four-engine jet aircraft operations at National would continue. Until there is a redevelopment of the airport's facilities, the final decision on the use of wide-bodied aircraft by any operator would be made by the director of Metropolitan Washington airports. Before those decisions could be made, an evaluation of the requesting air carrier's proposed operating plan would be undertaken, and the ultimate decision based upon the proposed operation's compatibility with the airport facility.

I should add that the FAA's Office of Flight Operations evaluated the operation of wide-bodied aircraft at National from the safety perspective. Actual flights, using the DC-10 and A-300, were monitored and evaluated by FAA inspectors to consider a variety of factors, such as approach acceptability and terminal area maneuverability. Those wide-bodied operations were concluded to be safe. Other wide-bodied aircraft would be similarly evaluated to assure safe operation before permission would be granted to use the airport.

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The curfew would lessen the impact of noise at National by curtailing operations during those hours when the annoyance from noise is greatest, or, put another way, when the ambient noise is lower. The introduction of wide-bodied aircraft at National will permit a shift in service to more environmentally acceptable and more fuel-efficient aircraft. Efforts to increase the acceptability of Dulles as an alternative to National will reduce the burden placed on National and its neighbors. Reductions in the number of hourly certificated carrier slots, coupled with a cap on passenger traffic at National, will provide future environmental relief.

Our policy deals with the demand of smaller communities within 650 miles for service to Washington. Commuters are available in many cases to meet that demand, but with the slot allocations in effect at National, there have not been adequate slots to permit commuters to provide the small community service. The proposed increase in the number of commuter slots would enable greater service to Washington from smaller communities.

Increased commuter slots would reinforce substantially the policy decision that National should remain a short- and medium-haul airport, with Dulles International and Baltimore-Washington International available for long-haul domestic or international

flights. Dulles and BWI have plenty of capacity available to meet added flights that may be occasioned by reduced certificated carrier slots at National in the next few years.

The adoption of a perimeter rule, thereby codifying in regulations the existing practice at National or one similar to it, furthers the policy decision to preserve the short- and medium-haul nature of the airport by formalizing the perimeter rule. The 650-mile rule with the seven exceptions, if adopted, would merely ratify a practice in effect at National since the 1960's.

The 1,000-mile perimeter rule responds to the concerns that permitting nonstop service to some cities beyond 650 miles but within 1,000 miles discriminates against other cities similarly situated, but lacking so-called grandfather rights.

I would like to point out to the subcommittee that FAA's Metropolitan Washington airports are Government operations that are currently returning revenues in excess of costs to the Treasury. There are reasons for this.

First, we operate the airports as efficiently as possible, using business as well as public service principles. We provide a service, and we charge for that service.

Second, revenues from the airports are deposited in the Treasury, while funds for capital improvements must be appropriated. We have not made significant capital improvements at National in recent years.

In anticipation of future investments at the airports, the Department of Transportation has under review the feasibility of different financing mechanisms for the airports. No decision has yet been reached as to whether a different means of financing might be more desirable than the current approach. However, the subject is receiving close scrutiny, and is but one measure of the importance we attach to improving the future operations of our Metropolitan Washington airports.

As for the subcommittee's interest in the problems affecting the FAA's airport policy, this is a subject that has been of longstanding concern to us. Over a period of years, we have had difficulty in recruiting and retaining high-quality police officers at the airports. While this problem has not been solved, the staffing differential provision of the Administration's pay reform proposal would be instrumental in helping to solve our problem as well as problems experienced by other Federal agencies employing law enforcement personnel.

In the interim, we are exploring with the Office of Personnel Management other means of improving our ability to recruit and retain well-qualified police officers.

Mr. Chairman, that completes my prepared statement. My associates and I would be very pleased to respond to questions that you may have.

Mr. ANDERSON. Thank you, Mr. Aaronson.

In the FAA's environmental impact statement, it shows that under the present pattern of operations at National Airport, a substantial area is subject to noise levels of NEF-30 or greater, and these noise levels are considered to be unsuitable for residential development.

I understand that you estimate that based on 1979 operations, the area around National which is subject to NEF-30 or greater is approximately 26 square miles. Can you tell us approximately how many people live in this area?

Mr. WILDING. It is our estimate, based on, unfortunately, some rather dated census data, that it is on the order of 100,000 to 150,000.

I might add, sir, if I could, that a great many of our noise complaints come from well outside of that area.

Mr. ANDERSON. Do you receive many complaints from persons outside the NEF-30 area that noise levels are unacceptable, and if so, does this suggest that your system of measurement is too conservative?

Mr. WILDING. We do in fact receive a lot of complaints from people outside of that NEF-30 contour. As a matter of fact, we did some experimentation with flightpaths south of the airport last summer and had occasion to do a lot of public opinion sampling at that time. We found that people well outside of the NEF-30 contour, running up to 30 or 40 percent of the people who were sampled, were severely annoyed by aircraft noise.

Mr. ANDERSON. So you receive almost as many complaints outside the 26-square-mile area as you do from those inside the 26 square miles.

Mr. WILDING. We receive a very, very substantial number outside of that 30-NEF contour.

Mr. ANDERSON. The environmental impact statement indicates that your proposed regulations would reduce the NEF-30 contour to approximately 13 square miles' compared to the present 26. Do you have an estimate of how many people live within the 13 square miles?

Mr. WILDING. Again, we have some rather dated estimates. We are hoping that the 1980 census data will catch up with us fast enough that we can be completely current with it. Our estimate is that we will be getting down to around 50,000 or 60,000 people who would remain in that contour once the policy is effective.

Mr. ANDERSON. So you will cut it from 100,000 to 150,000 to 50,000 to 60,000.

Mr. WILDING. Yes, sir, oriented just on that 30-NEF contour. But again, our frame of reference for what we sense as the noise problem at Washington National goes well beyond that.

Mr. ANDERSON. Is it possible to isolate the different factors which would contribute to the reduction of the NEF contour of 26 miles to 13 square miles? For example, can you tell how much of the reduction comes from stage 2 aircraft, replacement rule, how much from the curfew, how much from the reduction of four air carrier operations per hour, and how much from the substitution of quieter, wide-bodied jets?

Mr. WILDING. I am afraid I cannot offer you a set of arithmetic that adds to 100 percent on that, but clearly the single biggest factor which is reducing that contour out in the 1990 time frame, which is where we measured it in the environmental documents—

Mr. ANDERSON. We are talking about the 1990 time frame, right?

Mr. WILDING [continuing]. Yes, sir—is knocking off that nighttime activity, and of course, you would get the benefit of that immediately—of imposing the nighttime curfew and knocking off all aircraft operations effectively after 10:30. These noise-measuring methodologies give a very, very heavy weighting—

Mr. ANDERSON. Just so I get this, you said most of it. What do you mean by “most”? Thirty percent?

Mr. WILDING. I would think it would be well upward of 50 percent.

Mr. ANDERSON. More like 50 percent. That is from the curfew. Now, I mentioned the stage 2 retrofit, which we have heard a great deal about; I have mentioned the replacement rule, and the reduction of four air carrier operations per hour that you are suggesting, and the substitution of the quieter, wide-bodied jets you are also suggesting. Now, in relation to that 50 percent, which do you think would be the next largest one?

Mr. WILDING. Well, I might point out first—

Mr. ANDERSON. And I am not asking you to be exact, but I would like to get an idea of what you think are the important ones and which are unimportant.

Mr. WILDING. Right. The numbers that we are talking about, again, are 1990 numbers. Now, the contours that are presented and the data you are referring to look ahead to a situation where there are more than four air carrier slots an hour cut out. In fact, the projections in the EIS suggested that as the policy works its way through the 1980's, we would be down to 32 air carrier operations per hour by 1990, and it is that which is generating the noise contours that you are referring to. That factor becomes quite significant in the late 1980's.

Mr. ANDERSON. So, the reduction of the air carriers per hour would amount to roughly how much of your total cut back then?

Mr. WILDING. I would be very quick to say that I think better than 50 percent of that reduction is in fact attributable to the nighttime closedown. Once it gets beyond that, I would really hesitate to give you a feel for that.

Mr. ANDERSON. We do have a vote that we have to go to shortly, and I do want to go into this a little bit, and maybe while I am gone you can think this through. I am not going to ask you to an exact 100 percent, but I will want to know what your thinking is on how much does come from the stage 2, from the replacement, from the curfew, from the reduction, whether it is four per hour or whatever you think it will be over the time frame, and how much from the wide-bodied jets.

Mr. WILDING. Fine.

Mr. ANDERSON. We may have a second vote, but we are not sure. So we will recess now, go over and take care of our vote, and we may have to stay there for a little bit to complete the second vote. So at this time, we will stand in recess for approximately 15 or 20 minutes.

[Short recess.]

Mr. ANDERSON. The committee will come to order.

A few moments ago, we were into the question that I had asked about breaking down and isolating the different factors which could contribute to the reduction of the NEF contour. I was trying

to get you to give us an idea of how much would come from each of these different factors, the stage 2 retrofit, the replacement rule, the curfew, the reduction of air carriers per hour, and how much from the substitution of the quieter, wide-bodied jets. You had originally said about 50 percent would come from the curfew, and then later, you said about 50 percent would come from the reduction of air carriers. I would like to have you revise that a little bit, so that we may know how much comes from each one, in a general way, so we can see just how important it is, for example the wide-bodied jets in relation to retrofit, replacement rule, and so on.

Mr. WILDING. Yes, sir. We have not really wrestled together a set of arithmetic adding up to 100 percent, but my confidence during the intermission was buoyed up a bit that indeed, at least 50 percent of it would come from the curfew. Concerning the other three areas that you identified—the wide-bodies, the slot rollback, and the retrofit—our feeling is that the next most important factor which tends to shrink the noise exposure is the slot rollback, and that after that, the wide bodies and the retrofitted, present generation of aircraft would probably be on about an equal footing. So in terms of priority, the curfew clearly is in first place, in our minds, the slot rollback clearly is in second place, and then tying for third and fourth would be the wide-bodies and the retrofit.

Again, if I might interject, your frame of reference is the 30-NEF contour. We feel that the noise problem goes well beyond that.

Mr. ANDERSON. So really, then, the substitution of the quiet, wide-bodied jets is not a very big factor in this.

Mr. WILDING. Well, relative to the curfew, I guess we would say no, but we think it is an important element of this policy.

Mr. ANDERSON. It would be in the area of about, say, 10 percent?

Mr. WILDING. I would really hesitate to mention a number.

Mr. ANDERSON. 10 to 15 percent, maybe?

Mr. WILDING. The priorities I spelled out would have to put it in the 10 to 20 percent range to get back to 100 percent. But whether it is closer to 10 or 20, I am really not prepared to say.

Mr. ANDERSON. In your original EIS, you proposed to allow arrivals and departures between 10:30 p.m. and 7:30 a.m. for aircraft meeting specified noise criteria. Could you explain why you have not included this proposal in the supplemental EIS?

Mr. WILDING. I believe you said 7:30 a.m., and I think it was 7 a.m. that we proposed. We simply came to the conclusion in putting forward this proposal that while the stage 3 aircraft were much quieter than their cousins, they still made enough noise at night that we could expect a substantial amount of community impact. For that reason, we went the next step and just proposed the absolute closing of the airport at night.

Mr. ANDERSON. In its testimony last week, the Airline Pilots' Association suggested that because of the wake vortex which the wide-bodied jets create, a separate distance of 10 miles must be maintained between the wide-bodies and other aircraft. Do you agree with this statement, and if so, does it indicate that use of the wide-bodies would require reduction in the 60 operations an hour presently authorized?

Mr. AARONSON. Mr. Chairman, the question of separation between wide-bodied aircraft and other types of aircraft was considered as part of the evaluation that I mentioned in my prepared testimony, before we made this proposal. We found that the criteria which were applied across the country in accommodating this sort of operation would be met equally at Washington National Airport. I do not believe that those criteria have the 10-mile factor which you referenced. That factor relates to a military standard. The criteria that we have seem to be working well. I am not aware that we have received suggestions that they be changed elsewhere in the country, and so it is not clear that that comment really would have unique application to Washington National.

The bottom line, however, is that having received this comment, even though we had already considered the question, we are reconsidering the question now.

Mr. ANDERSON. We would like to have you, for the record, give us what you can determine on that question.

Mr. AARONSON. We would be pleased to, Mr. Chairman.

[The following was received for the record:]

FAA SUBMISSION

While FAA considered the matter of the safety of wide-body aircraft operations at Washington National Airport prior to publication of the policy proposal, it is, consistent with the comments received on that issue, reviewing the matter as a part of its deliberations on a final Metropolitan Washington Airports policy. The results of that review will be considered in reaching a final policy decision and the results will be provided to the Subcommittee.

Mr. ANDERSON. Do you have any estimates of the amount of airport development which would be required for National to go from its present 15 million passengers a year to 18 million, and would the same development be needed if the airport were to stay at 15 million? And would additional development be required for the airport to handle, say, 20 or 25 million passengers a year?

Mr. AARONSON. Mr. Chairman, the range of possible development investment we have looked at would be something on the order of \$75 million on the low end and perhaps \$200 million on the high end. And there is a correlation between exactly what gets built and how much it costs, vis-a-vis the total number of passengers which are anticipated. But actually, the bulk of the expenditures at either end of that range, or in the middle of it, would be oriented toward the quality of service provided to the users, rather than the precise number of passengers that would go through the airport.

I would use as an illustration that whether the passenger volume at National would be 15 million or 18 million or 23 million, the type of a modernized roadway system which we envision being needed would get into some substantial costs. It is true that if the passenger volume were to be at the high end, let us say of 25 million, we might have to add an extra lane, perhaps. But the major cost is in providing upgraded service to the user, regardless of the numbers. I would be pleased to expand on that if you would like me to, but let me ask you if that answers your question.

Mr. ANDERSON. Not entirely. When you were saying \$75 million at the low and \$200 million at the high, I thought you were saying in order to go to the \$18 million. Can you handle \$18 million without spending that money?

Mr. AARONSON. I would suspect that we could. If we are handling 15.1 million now, which we are, it is with certain inconvenience and discomfort to the users. We have systems at the airport, utility systems and structures, which are in poor condition and which need to be reconstructed. But it is true, they are handling the passengers. Our concern is, as I mentioned earlier, how much longer this 40-year-old facility can hang together. But I would not tell you that we cannot fit 18 million through there. It is just with a very low level of service, and perhaps with an increasing reduction in dependability. Traffic jams could be all the worse, with more delays to people; and services in the building might be interrupted more frequently. But theoretically, we could spend nothing and handle 18 million passengers.

Mr. ANDERSON. And you are using that basically on the one lane you have. The other two runways are too short, for most of the air carriers.

Mr. AARONSON. Yes, the runway capacity is adequate.

Mr. ANDERSON. So if you were going to go up to the 20 or 25 million, you would have to put in at least another longer runway.

Mr. AARONSON. No. I was referring to the roadway system, Mr. Chairman, in the front of the terminal building. I do not believe we would have to add any runway facilities, nor do I believe it is feasible.

Jim?

Mr. WILDING. Right. I would certainly agree with that.

Mr. ANDERSON. To handle 20 to 25 million.

Mr. AARONSON. It would depend on the fleet mix, of course. If there were a substantial number of wide-bodies, that would perhaps double the average number of passengers per flight in a wide-body as opposed to a narrow body, going from 100 to, say, 200 on an average load. And it is not hard to see how that could permit, depending on how many wide-bodies would be utilized, potentially quite a few more passengers on the same runway.

Mr. ANDERSON. Was the basis for the limitation to 60 operations an hour at National, was that safety or capacity, and have advances in the technology of air traffic control made it possible for the airport to handle more than 60 operations an hour?

Mr. AARONSON. The limitation which was put on many years ago, known as the high density rule, applied and continues to apply to three other airports. The purpose of it was to maintain safety but to insure efficiency in that the traffic volume was at such a point that we wanted to not have to hold aircraft. We wanted to be sure that they would be able to get in in a reasonable amount of time. There have been some technological changes, but the question that you raise really applies to the whole high-density rule and what evaluations need to be made of that, not so much to Washington National specifically. I certainly would acknowledge that our proposal here is taking the other tack. It is taking the 60 per hour at National as a given and then, for reasons of community acceptability, for reasons of facility development, for reasons of balanced use of airports in the area, is preserving that number.

Clark, do you want to add to that?

Mr. ONSTAD. Yes, if I could, Mr. Chairman, if you go back in history to the high density rule, you will find that the 60 per hour

at National and the 135 an hour at O'Hare, for example, are based on IFR movements. So they are based on a weather situation. And when we run VFR movements at any one of those facilities, we regularly go at above those limits. So it was not per se a question of safety. If you go back to the rulemaking, the preamble, you will find that the question was one of delay cost, principally. It was at the time in which, if you recall the photographs in "Time" magazine and others, of runways still with aircraft which were waiting to depart, so we got into a situation where we were burning undue amounts of fuel, and we decided what is a reasonable level, based upon efficient flow of traffic, and what is a safe level. But I want you to understand that on a VFR day, we do operate substantially above the IFR quota which is in the high density rule.

Mr. ANDERSON. Mr. Onstad, I understand that you have taken the position that imposition of a 500-mile perimeter rule at John Wayne Airport in Orange County is unlawful. In taking this position, you draw a distinction between the perimeter rule at National Airport and the proposed perimeter rule at John Wayne Airport. Could you explain the basis on which you draw this distinction?

Mr. ONSTAD. Certainly, Mr. Chairman. I would first like to go back in history and think about how the Congress structured the 1938 act, and then what was done to the Deregulation Act. In the 1938 act, Congress gave the Civil Aeronautics Board the authority to put into place a route structure which was one-stop, two-stop, and nonstop, so that when you applied for a route at a particular CAB proceeding, you got nonstop authority, one-stop authority or two-stop authority. That was written into your permit under section 401 of the act.

Now, if we go further, we find that John Wayne imposed its perimeter when the California PUC governed the activities at that particular airport. The licensing of Air California and Air West at that airport was done by the California PUC. We come down to the Deregulation Act. Congress took the PUC out of the act, basically. So we come under the question of a Federal license, and the situation is that if an airport proprietor is allowed to put on a perimeter rule, and it is the only airport in the area that is designated by the Civil Aeronautics Board as the destination point—let me give you an example. On the certificate of Air West and Air California, the point of service is the John Wayne Airport. On the certificates of the carriers serving Washington National Airport, the point on the certificate is the Washington, D.C. area, so that they are certificated to serve any one of three airports in the area. It is just like at Los Angeles, where there are four airports under the authority of the airport commission out there, and you will find most certificates allow the carrier to serve Ontario and LAX.

So what we are saying is that in a situation where a Federal license has been granted to serve a particular point, and if the local proprietor could come back in and impose a perimeter rule, then that proprietor would be usurping the powers of the Civil Aeronautics Board by imposing a onestop condition on the certificate which would have been granted as nonstop authority by the CAB.

In the situation which we have here, we have two airports, National and Dulles, which are under the control of one, single entity, the carrier is licensed to the area, and therefore, we find that it is the choice of the operator to decide whether or not it wants to allow a perimeter rule at National, so long as there is an airport in the area under the control of that particular airport authority that allows nonstop, unlimited service. And we find that in our analysis of section 105 of the Deregulation Act that for the proprietor such as Orange County to impose such a provision is violative of that particular section. So we find him in violation of section 401, the scheme of regulatory authority which the Congress put in place for the Civil Aeronautics Board, and then we find it is a problem under section 105.

Mr. ANDERSON. I tried following you, but this is hard to distinguish. Now, you state that at National, the carriers are authorized by the CAB to provide service to the Washington area and not specifically to National.

Mr. ONSTAD. Right.

Mr. ANDERSON. Now, it would seem that we authorize air carriers specifically to serve John Wayne Airport. Now, this to me is an artificial distinction because the CAB could just as easily authorize air carriers to serve the Los Angeles/Orange County metropolitan area, and further, when the Airline Deregulation Act is fully implemented, carriers will be able to serve any airport where they can get in because this distinction will disappear.

Mr. ONSTAD. Well, Mr. Chairman, if it were an artificial distinction, then we would not have the situation we have at Oakland. In other words, if you recall, there was a great effort by the Oakland parties to go back and have the certificates at San Francisco amended so that they read "San Francisco/Oakland," and it was only through that device that the Oakland parties were able to make Oakland equally accessible to the carriers as San Francisco.

The question, Mr. Chairman, really goes to the very heart of the Federal license—namely, can a local airport proprietor, after you have got a Federal license, dictate the kind of service, in terms of where you will serve in the marketplace.

Mr. ANDERSON. You also seem to suggest the distinction, that National and Dulles are operated by the same Federal Government, while John Wayne and Ontario are operated by separate entities.

You suggest that National and Dulles are able to function and provide coordinated service as part of an integrated system, and that is the existence of a perimeter rule at National does not preclude service to the areas beyond the perimeter, since there are no restrictions at Dulles.

Mr. ONSTAD. Right.

Mr. ANDERSON. Well, neither does this argument hold any water, because I am certain that LAX, Ontario and John Wayne could easily work together to provide coordinated service as part of an integrated system. However, this is not necessary, because one can get a flight from LAX or Ontario, to any of the points served from John Wayne.

The point, as I see it—and it is difficult, because I come from the area. Orange County is not in my area, but it is close enough that I

hear a lot about it. The point is that if the perimeter rule is a sensible policy for National, it also makes sense for John Wayne. And it is inconsistent for the FAA to say that John Wayne's perimeter rule is illegal, and at the same time advocate a perimeter rule at National. It gives local governments, at least in my area, the impression that the FAA is arbitrary and coercive.

Mr. ONSTAD. Let me disagree with your analysis at Los Angeles. For example, if you talk to Cliff Moore, you will find that Cliff would prefer more service at Orange County to draw off the traffic that he has at LAX, just like he would like more service at Long Beach. If we held a hearing on Long Beach, Cliff would be one of the first ones here to say more service at Long Beach.

Now, the Congress, has constructed two things which get in the way of the concept which you have articulated. One, you have constructed an ADAP statute, which says that the relationship between the Federal Government runs to the airport. And you have said, under section 18 or 16, I think it is, of the ADAP statute, that there has got to be fair and reasonable access.

So you have constructed the relationship not to LAX/Orange County. You have constructed the relationship to the airport, Orange County. We have that in conjunction with another Federal statute you have constructed, which is the licensing situation. So if—

Mr. ANDERSON. Now, while you are saying this, I am in my mind substituting almost everything you say—when you say "John Wayne" I put "National" in its place, and I try to see the parallel. Now, keep that in mind, too, because almost everything you say will apply to National when you say John Wayne.

Mr. ONSTAD. I understand that. Now, if the State of California, or if the airport commission of John Wayne and LAX were to form a compact, or if under State law, they made one entity, then exactly what you are suggesting would be feasible under the law. It would be identical to National and Dulles. But until you amend the relationship between the Federal Government and the local airport under ADAP, and you change the CAB's regulatory structure, then the situation is not at all on-point, because legal relationships run to the particular airport or to the particular commission, and in this case, it is the Federal Government and the FAA at National and Dulles.

Mr. ANDERSON. Gene, I have quite a few other questions here, but I think I will let you go first, and then I will come back to mine.

Mr. SNYDER. Mr. Chairman, before I ask any questions on my own, I want to ask unanimous consent that questions from Mr. Shuster of the subcommittee has requested be propounded to Mr. Aaronson be made a part of the record. I have a couple of copies here, so I will give one to Mr. Aaronson and one to the reporter, and he can answer those for the record for Mr. Shuster, if you would, Mr. Aaronson.

Mr. AARONSON. I will be pleased to do that, Mr. Snyder.

Mr. ANDERSON. No objection, so ordered.

[The following was received for the record:]

QUESTIONS FOR THE RECORD REGARDING PAST PLANNING OF THE FAA ON NATIONAL AIRPORT AND DULLES INTERNATIONAL AIRPORT WITH ITS IMPLICATIONS FOR ACTION

Witness: Robert J. Aaronson, FAA Associate Administrator for Airports.

Mr. Aaronson, I am interested in asking some questions on which you may care to comment, but, in any event, I refer to you for a written answer from the FAA for the Record of this Subcommittee on Aviation. It is my information that in July 1975 the FAA set forth its requirement for approximately 930 acres of property adjacent to the west boundary of Dulles International Airport. Apparently, at that time, the FAA requested that the General Services Administration negotiate with the owners of that property in order to exchange the desired property adjacent to Dulles for other Federal surplus property. Apparently no satisfactory conclusion could be reached because the Federal inventory of acceptable property did not match the value of the property adjacent to Dulles International Airport. Then, in February 1977, the FAA made public a "Study to update Master Plans" which projected acquisition of some or all of the property according to a land use plan for 1995 and beyond.

In view of the need to resolve use of National Airport and expanded use of the Dulles International Airport, I am most interested in what concrete steps the Department has taken or intends to take in the near future according to its own projected needs. It is important to know whether the FAA is still adhering to its 1977 plan, or has changed its plan, or has a plan.

Obviously, the Subcommittee, while anxious to resolve the matter of airport use shares with the FAA a desire to hold cost to the taxpayer to a minimum. Nonetheless, it appears, given attempts at action in 1975 and the apparent plan for action in 1977, that the time to resolve the situation is now.

Please respond as completely as possible in terms of FAA's actual plans and requirements so that the Subcommittee may be assured that we will not simply be again talking about this situation in 1985.

Answer. Under the project to update the Dulles International Airport Master Plan (initiated in January 1976) a Draft Preliminary Master Plan Report was issued in February 1977 and a Draft Final Report released in September 1977. Aviation forecasts developed and shown in the reports indicated the need for a third north-south runway at Dulles to satisfy operational activity beyond 1995. In recognition of this future requirement, the Draft Final Report recommended that additional land be acquired along the upper west boundary of the airport to provide for the future runway.

During the review process conducted on the Draft Final Report, it was determined that the updated Master Plan for Dulles should not be finalized until the policy question concerning the operation and management of both Washington National and Dulles Airports was resolved.

It is anticipated that the updated Master Plan study for Dulles will be finalized shortly after an operating policy is adopted for the Airports. The policy determination is scheduled for August of this year. However, certain revisions to the Draft Final Master Plan Report may be required in compliance with applicable policy considerations and quite possibly in accordance with changes in the air passenger market that have become evident since September of 1977.

Development at Dulles Airport is currently being accomplished as dictated by immediate needs and in accordance with the existing Master Plan. Once the updated version of the Dulles Master plan is completed and approved, it will provide the guidance for future airport development in accordance with future forecast needs and will aid in determining additional land requirements, if any, in order to safeguard the future growth potential of Dulles.

Assuming that an operating policy for Washington National and Dulles Airports is determined in August of this year, the update of the Dulles Master Plan will be completed in early 1981. That plan, once completed, will be the basis on which we make a decision whether or not to pursue the acquisition of additional property at Dulles.

Mr. SNYDER. I also have a question that my colleague, Mr. Bafalis, wanted me to ask, which I would like to ask before I go to my questions. I only have one copy, so I will just ask it.

It is my understanding that the FAA has made statements to Florida communities that would imply that parts of Florida would not be adversely affected by your proposed rule. Would you tell me if this is true, and how is the FAA in a position of determining what communities would or would not be served?

Mr. AARONSON. Mr. Snyder, I am not aware of any such statements that have been made by FAA people, although innumerable conversations are always a possibility. If we knew of a specific person who might have been involved, we could get into that.

But certainly, there are communities in Florida which are not grandfathered cities at the present time, which might be able to support nonstop service to the Washington metropolitan area from a marketing standpoint and which, if the 1,000-mile uniform perimeter rule were to be adopted, might get that service. Now, those communities would probably feel that they had been benefited. And I would certainly cite as an obvious example of that, Fort Lauderdale, which is not allowed to have nonstop service to Washington National today, even though its neighbor, Miami, which is further away, does have such service. I could suggest other communities as well in Florida, but they are probably less obvious.

Mr. SNYDER. Fort Lauderdale people can go out of Miami or West Palm?

Mr. AARONSON. Yes, they can, certainly.

Mr. SNYDER. Isn't it also true, as a followup on that, that if in fact your proposed rule were enacted, which would cut back the number of slots and increase the number of cities by extending the perimeter, that cities within the current perimeter and grandfathered cities would stand to lose service, generally speaking?

Mr. AARONSON. Unquestionably, if you have a fixed resource or pot of so many operations, what you say would be the case. But I would point out that whereas we have—

Mr. SNYDER. But it may or may not be those grandfathered cities in Florida, I understand.

Mr. AARONSON. Yes, but I think also from a quantitative standpoint, we ought to look at the extent of increase in potential cities that would be competing with each other for that service. Now, we have seven grandfathered cities today, and our assessment is that there are probably no more than five other cities that might be able to appeal to the airlines as markets that would support that service.

So while the distance between 650 miles and 1,000 miles as an increase seems like a lot, the number of larger communities that might support nonstop service in that area that do not already have grandfather status is very small, and therefore would not create a very large impact on overall service patterns. There would be some impact.

Mr. SNYDER. Let me just comment on the question I asked before your testimony, and suggest to you that the FAA ought to pay attention to these proceedings with particularity, because there may be some mischievous member of this subcommittee who might want to put a little amendment on the ADAP bill to preclude you from doing anything until that task force on airport access has made its report. I want you to understand that is not a threat; that is just an observation.

Mr. AARONSON. I understand, Mr. Snyder.

Mr. SNYDER. I believe, in observing the number of members that have paraded before this committee, that it would get considerable support on the floor.

Now, the chairman asked you a safety question about the wide bodies, in reference to ALPA's testimony last week about the necessity of increasing the separation. One of you indicated that that probably was not accurate. So I take it that you think that generally speaking, there would not be a lot of difference between operating wide-bodies at National and the narrow bodies that are operating there now. Is that correct?

Mr. AARONSON. Yes, that is correct, except that I would certainly acknowledge that the spacing standards, where a small aircraft would be following a wide-body would certainly impact the exact way in which the traffic flowed. But we do not believe that there would be so many wide bodies operating that we would be unable to accommodate all of the traffic coming in at that hour. It is just a matter of a minute or two adjustment to make sure the separation standard is maintained.

Mr. SNYDER. Now, just talking about the operation of the wide-body and not looking toward the separation, then it becomes your testimony, I think, that a 300,000-pound A-300 is no more difficult to operate into an airport like National than the smaller 727's and DC-9's.

Mr. AARONSON. That was most certainly the conclusion of our first analysis. We are, as I indicated earlier, taking another look.

Mr. SNYDER. Have you talked to any of those pilots about that?

Mr. AARONSON. Yes, we have, Mr. Snyder.

Mr. SNYDER. And that is their testimony to you?

Mr. AARONSON. Many of them, and of course, the pilots who flew the A-300 and DC-10 into National on the demonstration flights talked with our inspectors during the course of that operation; the inspectors were onboard the aircraft. They talked afterward, and certainly, those flight crew members at the time did not raise these kinds of concerns.

Mr. SNYDER. So it is further your testimony, then, that the margin for safety is no less on a 6,800-foot runway than on the length of runway that is normally used for wide bodies?

Mr. AARONSON. I am really not sure what the term "margin of safety" would mean in this circumstance.

Mr. SNYDER. Well, let us just go back in our memory a bit. A few years ago, there was an overseas National plane at, I believe it was JFK, that had bird ingestion. It was a wide body. Fortunately, all of the people on that plane were ONA employees, and they knew what to do, and they were able to evacuate, but they barely were able to salvage that situation on a 14,500-foot runway. What would have happened if that had happened at National?

Mr. AARONSON. I do not believe that the runway length was instrumental in that accident.

Mr. SNYDER. Do you want to tell me they did not use it all?

Mr. AARONSON. In terms of where they came to rest when they aborted?

Mr. SNYDER. Sure.

Mr. AARONSON. I am really not sure of the facts of it, Mr. Snyder. You are saying it was at an extreme end of the runway when it came to rest.

Mr. SNYDER. I am saying it was close to the end, and I am saying it was a heck of a lot further than 6,800 feet.

Mr. AARONSON. Yes, well, I think the answer to that, then, is that—

Mr. SNYDER. The answer to that is they would have been in the river, wouldn't they? They might have put the fire out, but it would have drowned them.

Mr. AARONSON. You are probably correct. But that same concern would apply to a 727 or any other type of aircraft. These wide-bodied aircraft have mechanical systems which are the equal of or superior to other earlier aircraft types in the fleet.

Mr. SNYDER. I believe it was in March of 1978 or thereabouts, a couple of years ago, that you made a proposal with regard to the number of hourly slots at National and the perimeter, and other things, wide bodies included, but you did not propose at that time to decrease the number of slots at National nor to change the perimeter. What has occurred in the last 2 years of substantial import that made you change your proposal?

Mr. AARONSON. Well, a number of factors, not the least of which were the comments received from the many parties in the earlier proceedings. As I mentioned earlier, those have all been analyzed, and it became clear to us that on that basis alone, we needed to rethink some elements of the earlier proposal.

Furthermore, we have had major changes in the air transportation industry in the last 2 years. Deregulation produced a great increase in traffic. National was experiencing much faster growth than it was back in the 1975-77 time period. And the new entry by a lot of carriers at National suggested that that pace of increased activity would continue. So all of that necessitated some rethinking.

Mr. SNYDER. Well, now, Mr. Aaronson, I am having a little trouble following you. The chairman said he thought he was following Mr. Onstad on John Wayne, but I am not following you on that one.

Increased activity from 1977, the slot numbers are limited now, and they were limited in 1977, and the limitation is the same, and they were being used to the maximum, basically, both times, weren't they? How could you have increased activity, except insofar as in VFR weather, you let some more GA's in?

Mr. AARONSON. No. There has been increased air carrier activity. It depends on exactly when you measure it. But not all of the 40 slots per hour have been used in every hour in every year. It varies in cycles. Right now, for example, we have a different situation than we did a year ago. So that is a factor, but not the major one.

Mr. SNYDER. I would not think it would be at all, because if they are not being used in any hour in the cycle, it is during the less busy time, and to pick up one or two going toward the 40 would not have any appreciable problem in regard to noise, because that is going to be the middle of the day, I would think, not in the morning and the afternoon, when people are coming in and going out of the Nation's Capital. I think that is a pretty flimsy argument.

I wanted to ask you one question, going back to when you interviewed those pilots who brought that A-300 in on the test flight, was it—

Mr. AARONSON. They were demonstration flights.

Mr. SNYDER. Were those ALPA pilots, or were they test pilots?

Mr. AARONSON. They would have been regular line pilots of Eastern Airlines and United Airlines, and I suspect they would be ALPA members.

Mr. SNYDER. I have been handed a table of total air carrier operations, submitted by APA into National, that indicates in calendar year 1972, there were 218,984 air carrier operations into National; in 1979, there were 207,112, a reduction of some 11,000-plus operations. That does not exactly jibe with your testimony that business has been picking up in regard to the number of carriers, does it?

Mr. AARONSON. Well, there has been a big difference in the nature of aircraft operated. That early 1970's figure would have included a large number of prop and propjet aircraft with lower passenger capacities. They would not have put the same strain on the terminal and roadway facilities, and would have made less noise.

Mr. SNYDER. Aren't the jets quieter?

Mr. AARONSON. No, sir. The jets are definitely noisier. The jets essentially would be the 727's, which have become—

Mr. SNYDER. You are saying jets versus props, and I am saying jets versus jets. Aren't the jets today quieter than the jets in 1972?

Mr. AARONSON. Not the ones that operate at National Airport, no, sir.

Mr. SNYDER. They will be under the noise bill when they retrofit them, won't they, and/or stage 3?

Mr. AARONSON. Not necessarily, because the stage 3 requirement relates to the size of the aircraft, and if we have a different mix of aircraft size at National, there is not a straight-line relationship there.

Mr. SNYDER. Why have you proposed to prohibit GA operations after 10:30?

Mr. AARONSON. It goes back to a comment that Mr. Wilding made earlier, that we reached the conclusion in putting together the proposal that, while some aircraft are unquestionably quieter than others, that during the late evening hours, given the areas that are under and near the flights paths into and out of National, that there is really no such thing as a quiet airplane, that they would all have an impact, and given the availability of another very large airport with plenty of capacity and facilities at Dulles, it is not a question of providing access to the Washington, D.C. area by not having those aircraft go into National and make noise at night. So I am saying that the consideration was the noise that they would make, and also a question of equity, one type of user of the airport versus another. If the airlines cannot go in, there is the question of, if other aircraft also make noise, why should they be allowed to go in.

Mr. SNYDER. In your notice of proposed rulemaking, you indicate that if the perimeter is expanded to 1,000 miles, Birmingham, New Orleans, Fort Lauderdale, and Kansas City would be eligible to receive nonstop service. Obviously, there are other cities, and you mentioned Fort Lauderdale earlier. So could you tell me what other cities are going to be eligible and competing for the service that now goes to the cities within the 650-mile perimeter?

Mr. AARONSON. Yes, as a legal matter, any city, theoretically, that was within 1,000 miles would be eligible. But we have analyzed the air traffic markets, coupled up with Washington, and other communities such as the ones you have mentioned—Fort Lauderdale, New Orleans, et cetera—and have only identified a total of those communities you just mentioned and one other which is a possibility, which would be Fort Myers, Fla. We are not aware of any other community between 650 and 1,000 miles which would be likely to attract nonstop airline service.

Mr. SNYDER. Would you explain to me—because the basis of this thing, basically, is noise—could you explain to me why it is that an airplane coming from Louisville, Ky. is more noisy than one coming from New Orleans or Kansas City?

Mr. AARONSON. I am sorry, Mr. Snyder, that it is noisier, or makes the same noise?

Mr. SNYDER. We are talking about proposing these rules on account of noise and all the inconvenience to people. And I understand when you cut down on the number of slots, you are cutting down on the noise, because you are cutting down the number of airplanes. But now, another part of the proposal is increasing the perimeter. And I do not know why an airplane that comes from Louisville, Ky. is any noisier than one that comes from New Orleans. How is that going to cut down on noise, increasing the perimeter?

Mr. AARONSON. It is not going to have anything to do with noise. That was not the motivation in making that proposal.

Mr. SNYDER. What is the motivation? I am a simple fellow, so make it simple.

Mr. AARONSON. Quite simply, Mr. Snyder, today we have in existence a perimeter which is informal in nature. It is not codified in regulation, it is not law. It is nevertheless being observed by the air carriers. But it is our feeling that this overall proposal requires this type of codification in order to assure that it will be adhered to in the future. And when we go to a regulation where the Federal Government is telling communities, carriers, et cetera, what they may and may not do, it occurred to us that the arguments that have been made over the years that there is a discriminatory feature in having some cities that are within 1,000 miles allowed service and others that may be closer to Washington not allowed service was an argument that deserved consideration. Now, we have not said we are persuaded by it. We were sufficiently convinced that it was an argument that needed to be looked at that we did suggest the two alternative approaches to the perimeter, and we were looking for comments on that and have received many comments. It would simply be to eliminate discrimination. There is no other motivation.

Mr. SNYDER. You mentioned it in your testimony, but would you repeat for me how many groups, organizations, civic bodies, elected officials, individuals, et cetera, have commented prior to the April 15 deadline?

Mr. AARONSON. Jim, do you have any numbers?

Mr. WILDING. I believe there was a total of about 500 written comments, and 100 people testifying at the public hearings in this go-around of the policy. Mr. Aaronson also referred to 1,000 com-

ments having come in in the 2-year-ago exercise that you referred to a few minutes ago.

Mr. SNYDER. What proportion of those responses reflected concern about the effect of the proposed policies on the level of air service to and from Washington?

Mr. AARONSON. We could certainly break them down in terms of where they came from. The ones from the Washington metropolitan area, which were very voluminous, included very, very few comments on that question.

Mr. SNYDER. I know you got one about the air service.

Mr. AARONSON. I said a few; there were some.

Mr. SNYDER. Because I wrote it.

Mr. AARONSON. We count your address as being both here and in Kentucky. We count you twice.

Mr. SNYDER. Well, I am not sure you have counted me at all yet.

Mr. AARONSON. Oh, we do, Mr. Snyder, always. [Laughter.]

So that would be the situation for residents of this area. The bulk of the comments from outside the Washington area expressed concern about the effect on air service, but not all. We had other comments expressing concern about fairness, that their community did not have access to this airport, and other communities did.

Mr. SNYDER. That is why you made the observation earlier that you wanted to help eliminate discrimination by eliminating the perimeter, isn't it—people were concerned that they did not have access to it.

Mr. AARONSON. Certainly, we have received those comments.

Mr. SNYDER. Why is the 1,000-mile perimeter any less discriminatory than the 650 miles, if you happen to live 1,100 miles away?

Mr. AARONSON. I do not think we could argue that the 1,000 miles is not arbitrary.

Mr. SNYDER. I think it is just as arbitrary as 650.

Mr. AARONSON. Any number that one picks is arbitrary.

Mr. SNYDER. Well, the difference is 650 does not get my town, and 1,000 does, and it lets other people compete for that business.

Mr. AARONSON. But there is a key factor here in that when that original perimeter concept was set up, it was that it would be a 650-mile limit, except for seven grandfather cities, all of which were identified as being within 1,000 miles. So the 1,000 miles has an historical significance, even though I have agreed with what would, I think, be your premise that it is still arbitrary, and all we are trying to do here with this alternative proposal would be to round off at that 1,000 which has historic significance, and not treat people within that 1,000 differently from others within the 1,000. The people who are outside of the 1,000, I agree with you, if I understand what you are saying on this, that they would still have an argument.

Mr. SNYDER. Yes, that is not hard to understand.

Have you at FAA made any effort, or any study, or any inquiry into perhaps changing Andrews into a joint military-civilian airport, particularly since you are proposing cutting down GA slots—as one of your proposals.

Mr. AARONSON. Yes, we have done so. The primary leadership on that has been taken by the Metropolitan Washington Council of Governments, which prepared a metropolitan airport system plan

approximately 3 or 4 years ago, and in the process of doing that plan, evaluated the potential of Andrews, both from a capacity and an environmental standpoint, and also the transportation role that it might serve. The conclusion of that study, as I recall it, was that not only did the Defense Department object strenuously to the concept of any shared use of Andrews, but that it was not as advantageous as it might appear on the surface, that there were significant potential environmental problems surrounding increased and civilian use of Andrews. Specifically, the number of residences that had been built around it would involve serious noise problems and complaints at Andrews, and therefore, the problem would be getting moved to a certain extent. But I think the more important factor—

Mr. SNYDER. Well, now, is moving the problem wrong? You suggested here in one proposal a few years ago changing the pattern at National in order to diffuse the noise. I believe I am correct on that.

Mr. AARONSON. Well, the community has made suggestions, via the Council of Governments, to experiment with that pattern, and we have accommodated where we could those requests for experiments. And it has not led at this point to any major change in practices.

Mr. SNYDER. In your statement, you indicated that the revenues generated from the operations at National and Dulles are higher than the amounts appropriated by Congress to run these airports.

Mr. AARONSON. Yes, sir.

Mr. SNYDER. Historically, how much more have you been taking in out there than you have been receiving through the appropriations process?

Mr. WILDING. We have been in a profitable posture for the last 4 years. The most recent year had an \$8.3 million profit.

Mr. SNYDER. In this period of austere times, if you cut down the slots by 18, almost 20 percent, aren't you going to cut down the revenues?

Mr. AARONSON. We would not be cutting down the revenue in terms of the agreements that we have with the airlines, because the costs of the airfields are divided by the number of uses, in effect; it is a weight formula, as I am sure you know. And therefore, the airfield costs would still be recovered. The airfield is a break-even operation. The surpluses, if you want to call them that, are being obtained in the concessions areas, the parking lots and restaurants, and we are not proposing to cut the use of those facilities one iota. The 15.2 million passengers that use National now would at least be there, added to by some other number, perhaps, and those revenues would stay up.

Mr. SNYDER. Whatever portion you get for landing fees, et cetera, is going to be cut by almost 20 percent, isn't it?

Mr. AARONSON. No, it would not. The unit cost would go up to make up for that.

Mr. SNYDER. Oh, you are going to increase the landing fee for the air carrier, then, in order to make up for that?

Mr. WILDING. Well, of course, we would anticipate that some of those would go to Dulles and simply be paying us at Dulles rather

than paying us at National. But then, as Bob points out, there is a mechanism that brings us back to a given bottom line.

Mr. SNYDER. It might go to Baltimore.

Mr. AARONSON. Some of it inevitably would. But nevertheless, our agreements with the airlines would assure that the difference would be made up.

Mr. SNYDER. I am sure they will be interested in that observation.

Mr. AARONSON. Well, the amount of dollars involved, I think, would be quite small.

Mr. SNYDER. I have not noticed that they are in a profitable position lately.

Mr. AARONSON. Not this year, Mr. Snyder.

Mr. ANDERSON. I would like to get back to the perimeter rule. As I understand it, the purpose of the National Airport perimeter rule is to encourage development of National as a short-haul airport. In actual practice, the rule does not seem to have this effect. Many flights stop at a city within the perimeter, such as Atlanta, and then continue to other cities, such as Dallas and Houston. Thus, the effect of the rule may be to require excessive service to cities within the perimeter and to prevent nonstop service to cities beyond the perimeter. I would appreciate your comments on the advantages of the perimeter rule.

Mr. AARONSON. Well, certainly, your observation is correct, Mr. Chairman, that just that phenomenon appears to have occurred in certain markets. I am not sure what comments we might make as to the advantage or disadvantage. In a simple world, I suppose we would like to see whatever perimeter rule existed be universal in its application, but there is no way to enforce the beyond destinations, given the linear nature of airline routings.

Jim, do you have any further thoughts on that?

Mr. WILDING. No.

Mr. AARONSON. So it does happen.

Mr. ANDERSON. Some witnesses have suggested that it would be more appropriate for National and Dulles Airports to be managed by a Federal corporation or a local authority than by the FAA. I would appreciate your views on the advantages and disadvantages of FAA management, compared to these alternatives.

Mr. AARONSON. Well, we are evaluating the whole set of questions that that is a part of right now, and not strictly as a staff exercise. Secretary Goldschmidt has asked us to undertake that kind of a review and present him with our assessment and with the alternatives.

We do have some unique problems, given the Federal ownership of these two airports. It creates a situation where the community feels more frustrated in terms of its ability to have a voice in the operation of these facilities, vis-a-vis what happens in just about any other community that you will find, and that does make our job a difficult one, unquestionably, because we have a Federal Government responsibility to fulfill, and yet we try to listen and communicate as well as possible with the community at the same time.

I mentioned in my testimony the question of financing, of future improvements. Depending on what answers we come up with there,

maybe some other arrangement could help the financing; whether it would be Federal ownership under a different kind of a structure or whether it would be some other kind of ownership is the type of question we are looking at, because certainly, most airport improvements around the country are financed by revenue bonding. In the case of National and Dulles, our historic practice is to rely on appropriations.

I think clearly, we will have further—

Mr. ANDERSON. When Congressman Carr testified at our hearing last week, he raised several questions about the safety of air carrier operations at National Airport. He pointed out two problems with the difficulty of the river approach by air carrier aircraft. First, he stated the air carrier runway at National is not aligned with prevailing winds, and that there are dangerous, turbulent crosswinds from the Crystal City direction.

Secondly, he claimed that the river approach to runway 18 requires maneuvering the aircraft at sometimes spectacularly high rates of bank, turn rates, and at very low altitudes. I would appreciate your comment on whether the conditions cited by Congressman Carr create serious safety problems for operations at National Airport.

Mr. AARONSON. Mr. Chairman, might I ask you whether, in talking about the crosswind problem, the Congressman was referring to commercial activity, or was that comment mainly directed toward general aviation? Did it include commercial, the jets?

Mr. ANDERSON. It included commercial. He was talking about a specific flight, but he was also talking in general terms. But I think his main theme was regarding commercial.

Mr. AARONSON. Well, I want to say that the FAA considers Washington National Airport to be a completely safe operation. And I will ask Jim Wilding, if he has any information, to comment on the crosswind issue.

Mr. ANDERSON. Well, if you were going to locate at an airport in a similar area, and had the opportunity to direct the runways with the prevailing wind, as in other areas, you would say it would be safer to have it in the direction of the prevailing wind. Now, it is my understanding that at National we are almost at cross-purposes with that.

Mr. WILDING. I really do not think that is correct. Runway 18-36, at Washington National is the runway to which you are referring. There are very, very few hours of the year when there is a sufficient crosswind on that runway that it is not usable, really, either by GA or by the air carriers.

Mr. SNYDER. Would the Chairman yield?

Mr. ANDERSON. Yes.

Mr. SNYDER. You know, I got in a flap with Congressman Carr because I think National is a safe airport, and I think the record shows that. But I am inclined to agree that this does constitute a little bit of a problem, and I just wanted to ask you this. Am I incorrect that the TWA plane that went in—I believe it was TWA—because of the faulty communications out at Dulles a few years ago, wasn't that a diversion because of crosswinds?

Mr. WILDING. It certainly was, and that was a storm the intensity of which was almost unparalleled in this area. It did physical

damage at both airports and caused some problems out at Dulles which are almost unique in our experience.

Mr. SNYDER. Thank you, Mr. Chairman.

Mr. ANDERSON. You were going to get into this, weren't you?

Mr. WILDING. Well, again, with respect to the crosswinds, any runway is unusual if you get more than 92 or 93 percent coverage of annual wind conditions. Runway 18-36 at Washington National has that, and has it better than some of our runways at Dulles.

Mr. ANDERSON. Could you supply that for the record, because the question has been raised, and the finger has been pointed at our committee, and if there are conditions there, we would like to be assured by your—

Mr. WILDING. We would be happy to, but I would distinguish those crosswind comments from the twisting approach into Washington National, which is a totally different subject in my mind.

Mr. ANDERSON. Would you want to go into that a little bit?

Mr. WILDING. Well, not other than to state the obvious to anyone who has flown in there, that indeed, coming down the river, one has to stay away from overflying downtown Washington and does make a fairly severe turn into the airport.

Mr. AARONSON. Nevertheless, that turn is in conformance with FAA criteria, and is considered to be perfectly safe by the FAA. [The following was received for the record:]

[FAA SUBMISSION]

The principal runway at Washington National Airport (Runway 18-36) is properly aligned with respect to the winds which are experienced at the airport. Slightly better than 95 percent of the time the crosswind component on Runway 18-36 is 15 miles per hour or less and slightly better than 99 percent of the time it is 20 miles per hour or less. These figures indicate that the wind coverage provided by the alignment of Runway 18-36 is excellent.

It should be noted that the prevailing winds in the Washington Metropolitan area are, in fact, north-south. The principal runways at Dulles International Airport, Andrews AFB, and Washington National Airport are all aligned in the north-south direction.

Mr. ANDERSON. The next question I have is based on concerns that have been expressed by a member of the New York delegation, and you may have heard it earlier. What effect would the proposed FAA regulations have on a carrier such as Air Florida, which provides the only service to Washington National for the residents of Westchester County, N.Y., and its environs via Westchester County Airport? The airline initiated service less than a month ago and provides service to Florida, with a stopover in Washington, D.C. What is the likelihood of termination of service to this area? Westchester County Airport serves most residents to the north of New York City, as well as the residents of Connecticut.

Mr. AARONSON. Mr. Chairman, offhand, I do not see any direct relationship. I agreed with Mr. Snyder earlier, that certainly, there would be some flights in the system that would have to be reduced; that is obvious. And the number of seats involved would be made up for in certain markets by the use of wide-bodied aircraft. But I am not sure how one can say that White Plains or any other particular market is the one that would not receive the service. It is really a question that the airline would have to evaluate where the market is.

Mr. ANDERSON. You are reducing the slots, so some flights will have to be discontinued there.

Mr. AARONSON. Yes, but I do not understand offhand, having heard Congressman Peyser this morning, why he was suggesting White Plains specifically. White Plains is part of the New York metropolitan area, it is a rather large market, and my own guess would be that that would be a rather healthy market and probably would not have attracted Air Florida's interest in the first place if that were not so.

So, I am not saying, it could not be that that market would lose some service, but I also do not see why that obviously is the one that would lose it. Really, I think more of the losses would be where you have multiple frequencies, and you could replace those with larger aircraft under the changed rule. There would be some reduction in total number of flights, and those could come out of larger markets. Some would come out of smaller markets.

Mr. ANDERSON. We have heard testimony that a few years ago, the FAA proposed to adjust flight patterns from National so that the noise impact would be scattered. Apparently, these efforts were abandoned after protests were received from areas subject to the increased noise. Are there any steps currently underway to develop a scatter pattern?

Mr. WILDING. Yes, sir, there are. Several years ago, it occurred to us, after talking to some people in the region, that scattering the air traffic from Washington National might be a good noise abatement approach. We went around the region, I believe it was in 1977, and held six public hearings, and clearly the people who showed up at those hearings did not think it was a good idea at all. We dropped it at that point, but then recently, really within the last year or so, there has been rekindled this interest in the region in a scatter plan. Through the Metropolitan Washington Council of Governments, we are now putting on paper a proposed scatter plan which, if it holds up on paper, may well be tested late this year or early next.

Mr. ANDERSON. Mr. Fary.

Mr. FARY. Thank you, Mr. Chairman.

Mr. Aaronson, how many slots per hour are presently located to commercial carriers, and how many do they use?

Mr. AARONSON. Well, they presently have 40 per hour allocated to the air carriers. That does not include the commuter airlines, which is a separate allocation. Of the 40, they typically use somewhere between 35 and the full 40. I will ask Jim Wilding if he has any very current numbers on averages.

Mr. WILDING. Perhaps I could give it to you on a daily basis. The 40 per hour, times the 15 hours of the day, plus the magic minute at 10, would permit, under today's guidelines, a total of 640 air carrier schedules. Of those 640, there are 570 to 575 actually used today, but I would urge you to be a little cautious of those 40 right at that magic minute of 10. Only about 20 or 22 of those are filled today. You almost have to treat that magic minute a little bit separately.

Mr. FARY. I realize that noise is a major consideration in the FAA's rulemaking, but I also note a consideration for the level of passenger traffic at National. Why are you cutting back on the

number of commercial airline slots and at the same time allowing wide-bodied jets?

Mr. AARONSON. Mr. Fary, as you indicate, the environmental consideration is certainly an important part of that. But also, the question of how the passengers are accommodated, the quality of the facilities, whether the passengers are comfortable, are able to have access on the roadway system, that sort of thing all weaves into that. We just are having our capabilities severely stretched, as I think is obvious in any user of the airport at the present levels. Once we know exactly what kind of policy we are operating in, we can build improved facilities, certainly, to overcome some of that. But we are trying to create a situation that we call managed growth at National, not reduction, but managed growth of passenger volumes, and to utilize the other facilities in this region that are available, have the facilities, and are being underutilized today. We think that that would be the most effective and efficient overall use of publicly owned facilities.

Mr. FARY. This subcommittee was concerned with airport access when we were working on the ADAP legislation. How will the FAA guarantee access to new carriers or small airlines to National? Won't the auction system that has been recommended in an FAA study discriminate against these new airlines?

Mr. AARONSON. Mr. Fary, the auction idea is, as you indicate, one of several that are under consideration, and in fact, we will be issuing in the next several days or certainly, in a notice of proposed rulemaking that sets forth the auction and other schemes for public comments, and this would apply to National. So your question is certainly very timely and relevant to what we are doing.

One of the things that is spelled out in that proposal would be to distinguish between different groupings of types of airlines or types of communities serviced—let us say small community service, as an example—and to reserve a certain batch of the slots for the users within that category to compete only with themselves via an auction among themselves or via some other kind of an allocation technique. So that is all up for comment, and it is certainly going to be a complex thing for us to sort through when we have the comments.

Mr. FARY. The Airline Pilots Association testified last week that it was unsafe to allow wide-body-jets to use National because of the air turbulence they cause. Could you comment on this? Would you increase the spacing between flights?

Mr. AARONSON. While FAA considered the matter of safety of wide-body aircraft operations at Washington National Airport prior to publication of the policy proposal, it is, consistent with the comments received on that issue including the views expressed by ALPA, reviewing the matter as a part of its deliberations on a final Metropolitan Washington Airports policy. The air traffic system accommodates a great deal of wide body flight activity at many airports throughout the country and does, in fact, provide an adjustment to the spacing of flights following widebodies to accommodate the potential wake turbulence phenomena associated with those types of aircraft.

Mr. SNYDER. Mr. Chairman, before you recess—if the gentleman would yield, because I may not be able to come back after the vote; some of us are having lunch with your Governor, and I would be glad to take you along, if you want to give him your support—but Mr. Fary brought up a subject which has been of some concern to me, and that is this auction process, and I was reluctant to pursue it until I saw your proposal. But I want to say that not having seen it, it is a little bit presumptuous to question it. But I am concerned about that kind of a process, and particularly Air Florida has been mentioned here several times today as to their capability to bid against United, American, and the bigger airlines that I have to assume have more resources and are flying, I guess, larger aircraft, and have more receipts and are able to make higher bids and have higher expenditures. I just want to express that concern because I do not think that we want to just necessarily preserve the airport at the Nation's Capital for the more affluent and the larger trunk carriers.

Mr. ONSTAD. Mr. Snyder, if I could respond to that briefly, I wanted you and the committee to understand how we got into this particular aspect before the rulemaking comes out. As you know, the Congress has vested the Civil Aeronautics Board and subsequently the Justice Department with the antitrust authority and the scheduling committee, and those two agencies have indicated that they do not want the scheduling committee to continue. The question then comes down to how do you allocate, and that is the simple process that we are trying to work our way through. The proposal has numerous different kinds of allocation techniques in it, and we are not wedded to any of them, but that is the posture we find ourselves in.

Mr. SNYDER. Well, I would assume—and I think that the Levitas proposal in the ADAP bill for the task force on airport access is going to be enacted into law when we enact the ADAP bill—I think it is; it had pretty uniform support here, and I have got some problem understanding why anybody is going to attack it with this much force, because it does sound like a proposal that has considerable merit, and I would hope that they would come up with some proposals for you that would be very helpful.

Mr. ONSTAD. Well, I think that that access task force is very timely. But the other point is that this is a rulemaking, with a lot of time for comment. The work we have done already will provide valuable staff input to the airport access task force if the Congress does ordain to go forward with that movement.

Mr. SNYDER. Thank you, and I thank the gentleman for yielding.

Mr. ANDERSON. At this time, we are going to recess, but just so you will know what our schedule is, we are going to recess just to catch the vote, and then we will come back and take care of Mr. Fary's questions, so you will have to stay here. And then, we are intending to recess for lunch. So for those of you who want to go to lunch now, I suppose you could. So at this time, we will recess to catch this vote. The meeting is recessed.

[Short recess.]

Mr. ANDERSON. The committee will come to order.

At the moment of our recess, Mr. Fary was directing a question to the witnesses. Mr. Fary, the floor is yours.

Mr. FARY. Thank you, Mr. Chairman. I am sorry for the intrusion.

Could you describe in detail how the slotting committee presently works, and why should it be phased out?

Mr. AARONSON. Mr. Onstad will answer that, Mr. Fary.

Mr. ONSTAD. Well, first off, we have not reached the judgment that it should be phased out, and by law, that judgment is not vested in the Department of Transportation. The Congress has seen fit to vest that decision in the Civil Aeronautics Board and the Justice Department. As to how it works, it essentially consists of a group of air carriers sitting in a room, pursuant to an order of the Civil Aeronautics Board giving them antitrust immunity. And what they do in that forum is start out with an historical base of slots, and then if somebody else wants more slots, they sit around until, in effect, some party gives up a slot. For example, as I recall, Midway Airlines sat around in the room for several days—it is a fascinating exercise, if you have ever had the chance to go; if you have not, I recommend it. People will sit there for four hours at a time, sometimes, without a move. And the chairman goes around the room, and he keeps asking, "Will somebody make a move?" and everybody looks down at the table, and nobody makes a move.

But essentially, since the slots are pretty much all taken, though not necessarily used, the process by which a new carrier gets a slot is for some existing carrier to give one up. And there is an interesting analysis of group pressure which is brought to bear, in a study done by Polinomics, and I commend that to your attention, because this is a very interesting section on the group dynamics which takes place with the people around this table and their interrelationships.

So the bottom line is that you have a group of air carriers sitting around a table, you have a chairman, and they indicate how many slots they want per hour, and if that exceeds 40, then they sit around until somebody withdraws their request. And if a new carrier wants in, it does not have slots until somebody gives up a slot so the new carrier can get in.

Mr. FARY. In your statement, you say you are going to make Dulles more attractive. How are you going to do this?

Mr. AARONSON. Mr. Fary, that reference was particularly to ground transportation, although it would apply to other areas, as well. We have a project underway which is more than half finished right now, that creates much expanded and more comfortable passenger waiting lounges, and we intend to continue with that kind of improvement. But on the ground transportation front, we think that it is possible to get a service which would serve more points in the metropolitan area, with faster trips, probably using the kind of buses that traditionally have been used, but to market that service, to make it better known to people, and to generally make it more attractive. And we will be in the next year developing a request for the industry to formally respond to to find companies that would hopefully be willing to provide the kind of service that we are now trying to design.

Mr. FARY. What prevents the FAA from offering price incentives in terms of landing fees for users of Dulles and charging more for landing fees at National? Is there any way to unify the accounts of

the airports so that users of one would subsidize users of the other? Are there reasons why this type of system could not work?

Mr. AARONSON. Mr. Fary, there is an element of that in the present system, which I will have Mr. Wilding give you a little bit more information on. But certainly, we agree with the premise of the question that the two airports should and do operate as a single financial system. The agreements that we have with the airlines recognize this concept.

Jim, would you comment further?

Mr. WILDING. Right. As Mr. Aaronson mentioned, our current landing fields at both airports are actually unified for the generation of a landing fee, and indeed, we charge a landing fee of about 37 and a fraction cents at Washington National and 39 and a fraction cents at Dulles. If they were permitted to float freely, the landing fee at Dulles would be in the 65-cent range, and the landing fee at Washington National in the 12- to 15-cent range. So we have, in fact, put them together, and in the contract we negotiated with the carriers, call for almost a common landing fee.

Mr. AARONSON. I wanted to add one other comment that might be of interest to you, and Mr. Onstad also has a legal point, Mr. Fary. While we have the type of system we just described to you, we also are not aware of any real degree to which the airlines historically have taken this kind of cost into consideration in deciding where to schedule their aircraft. There are so many elements of their cost base, and airport costs in total, including landing fees and space rentals typically have been running around 3 to 3.5 percent of the total airline's costs. So even if the landing fee at Dulles were half that at National, or maybe even a quarter, there is no hard evidence at this point that that would strongly influence airline scheduling decisions. That is true here, and it is true around the country.

I would like to have Mr. Onstad make a comment on this, too.

Mr. ONSTAD. There is one point, Mr. Fary, that should not be lost sight of, building on Bob Aaronson's point, and that is there is a 1951 statute which requires us to charge in relationship to cost, and for there to be an economic inducement for a carrier to move to Dulles as opposed to National, we would have to exceed costs—we have done studies on this—and we would have to exceed our costs out there. And since Congress will not let us charge any more for our landing fee type services than what it costs us to provide the service, we cannot create a sufficient differential in price to induce people to go to Dulles.

Mr. FARY. Could you provide copies of that statute for the record, Mr. Onstad?

Mr. ONSTAD. Yes.

[The following was received for the record:]

§ 483a. Services as self-sustaining; uniformity; regulations; deposit in Treasury; effect on other laws

It is the sense of the Congress that any work, service, publication, report, document, benefit, privilege, authority, use, franchise, license, permit, certificate, registration, or similar thing of value or utility performed, furnished, provided, granted, prepared, or issued by any Federal agency (including wholly owned Government corporations as defined in the Government Corporation Control Act of 1945) to or for any person (including groups, associations, organizations, partnerships, corporations, or businesses), except those engaged in the transaction of official business of the Government, shall be self-sustaining to the full extent possible, and the head of each Federal agency is authorized by regulation (which, in the case of agencies in the executive branch, shall be as uniform as practicable and subject to such policies as the President may prescribe) to prescribe therefor such fee, charge, or price, if any, as he shall determine, in case none exists, or redetermine, in case of an existing one, to be fair and equitable taking into consideration direct and indirect cost to the Government, value to the recipient, public policy or interest served, and other pertinent facts, and any amount so determined or redetermined shall be collected and paid into the Treasury as miscellaneous receipts: *Provided*, That nothing contained in this section shall repeal or modify existing statutes prohibiting the collection, fixing the amount, or directing the disposition of any fee, charge or price: *Provided further*, That nothing contained in this section shall repeal or modify existing statutes prescribing bases for calculation of any fee, charge or price, but this proviso shall not restrict the redetermination or recalculation in accordance with the prescribed bases of the amount of any such fee, charge or price.

Aug. 31, 1951, c. 376, Title V, § 501, 65 Stat. 290.

Mr. FARY. Thank you very much.

No other questions, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Fary.

Congressman Mineta had made a request that he wanted to submit some questions to you for the record. We have already given the questions to the clerk and to yourself.

[The questions referred to follow:]

FAA RESPONSE TO ADDITIONAL QUESTION POSED BY REPRESENTATIVE MINETA

SAFETY AND SLOTS

Question. Presumably there is a maximum number of jet transport aircraft that can safely be landed at National, and the present traffic level must be very close to that limit. You can often clock the landing and takeoff sequences on the main runway at less than two minutes separation. What is the significance of extra section? Why are they permitted? Don't they constitute an open-ended exemption to any slot restriction? Isn't an additional flight the same in terms of air traffic control whether it is an additional slot or just an additional section? Shouldn't we be setting some limit on the number of slots based on whatever capacity really is, and then not permit additional sections?

Response. The numbers of aircraft operations which are conducted at Washington National Airport are controlled by FAA's High Density Rule. Throughout the 10-year history of that rule, the rule itself has provided an exemption for "extra sections." Our experience has been that extra sections at Washington National have been primarily those associated with Eastern Air Lines' New York shuttle service. There is, however, also a tendency for other airlines principally at peak holiday periods to schedule extra sections to accommodate the unusually heavy holiday passenger loads. Over the last several years, as Eastern Air Lines has introduced larger aircraft into their shuttle system, the total number of annual extra sections at National has declined. Extra section flights presently constitute less than two percent of aircraft operations at National. It is probably accurate to say that within the framework of the High Density Rule itself there has been "an open-ended exemption" for the extra sections, but as indicated above, the actual number of such operations has been relatively small. Viewed in terms of our proposed policy, which has proposed an annual passenger cap at Washington National Airport, any "open-endedness" on extra sections is eliminated since the passengers on any such flights would also be counted against the annual passenger cap.

NOISE REDUCTION

Question. The diagram shows substantial reduction in noise contours as a result of the proposed plan. What factors contribute how much to that reduction? How much, if any, is attributable to the changes in: curfew hours? permitting widebodies? changing the perimeter rule? capping total annual passengers? to the noise reduction which would occur anyway due to the phasing in of quieter aircraft complying with FAR 36 stage 2 & 3?

Response. The techniques which are used to estimate aircraft noise exposure do not lend themselves to precise estimates of the contributions of the various elements of our proposal to the overall noise reduction. It is however, our view that the proposed curfew at Washington National accounts for at least 50 percent of the reduced noise exposure which we are forecasting should our proposed policy be implemented. The next most significant element of the policy proposal from the standpoint of the diminished noise impact is the proposed slot rollback. We believe that the introduction of widebodies and the retrofit program are about on an equal footing in diminishing future noise impacts. It should be noted that, in the environmental documents, we have forecast future noise levels both with and without the policy. In these forecasts, the retrofit program is a constant; i.e., in forecasting the 1990 noise levels for the status quo, no policy case, the benefits of the retrofit program are included.

OBJECTIVES

Question. To what extent is this plan proposed to: meet noise objections? meet ground access/congestion problems? cover the Federal investment at Dulles and to force a more rational distribution of traffic among the 3 metropolitan airports? have a fixed growth plan to enable the redesign of National Airport to have known design criteria? [sic]

Response. A policy is needed to resolve the longstanding uncertainties on the role that each of the local airports should play in meeting the Metropolitan area's aviation needs. These uncertainties relate heavily to the severe aircraft noise problems at Washington National and have resulted in facility stagnation at that airport. A policy determination is essential to the goal of rebuilding National and in doing so to overcoming many of its ground access and congestion problems. The primary means of bringing about the above objectives is to move toward a more rational distribution of traffic among the three metropolitan airports. Once a policy is put into force, we believe that we can and should move forward as quickly as possible with a redevelopment of Washington National, but the design for such a redevelopment has not yet been established. That would come as part of a master plan process which we intend to undertake as soon as the appropriate policy decisions are made.

METROPOLITAN DISTRIBUTION

Question. At present, the metropolitan area generates about 23½ million passengers annually: about 16 million, or 68 percent use National; about 4 million, or 17 percent use BWI; about 3½ million, or 15 percent use Dulles. Is this a logical efficient and safe distribution of the traffic among those facilities? Does it represent optimum utilization of those three airports and of the Federal investment in each?

Response. We believe that the current distribution of activity between the three airports is safe but we do not believe that it is either logical or efficient. We believe that a more optimum utilization of these three airports would result from implementation of a policy for the future along the general lines of those which the Department proposed in January.

Question. It has been said that the wake vortex created by the widebodies would result in an unsafe condition because of the restricted approach corridor at National Airport. Is that true?

Response. While FAA considered the matter of safety of wide-body aircraft operations at Washington National Airport prior to publication of the policy proposal, it is, consistent with the comments received on that issue, reviewing the matter as a part of its deliberations on a final Metropolitan Washington Airports policy. The air traffic systems accommodates a great deal of widebody flight activity at many airports throughout the country and provides an adjustment to the spacing of flights following widebodies to accommodate the potential wake turbulence phenomena associated with those types of aircraft.

Question. Are you saying in your testimony that a 300,000 pound A-300 is no more difficult to operate into an airport like National than the much smaller 727's and DC-9's?

Response. While the family of 2- and 3-engine widebody aircraft which we have proposed to permit at Washington National are heavier than the 727's and DC-9's now in use at the airport, their flight characteristics are such that in our view the margin of safety associated with their use would be no less than that currently associated with the 727's and DC-9's. We are, however, as a result of comments on that issue which have been provided to us in the policy process, reviewing that matter as a part of our deliberations on a final Metropolitan Washington Airports policy.

Mr. ANDERSON. At this time, we will recess until 1:30 for lunch. Thank you very much, Mr. Aaronson, Mr. Onstad, and Mr. Wilding, for your appearance.

Mr. AARONSON. Thank you, Mr. Chairman.

[Whereupon, at 12:40 p.m., the subcommittee was recessed, to reconvene at 1:30 p.m., this same day.]

AFTERNOON SESSION

[Whereupon, at 1:40 p.m., the subcommittee reconvened, Hon. Glenn M. Anderson (chairman of the subcommittee), presiding.]

Mr. ANDERSON. The subcommittee will come to order.

I have just been handed the statement of Senator Paul Sarbanes who would like to have this submitted as a statement in today's record. If there is no objection, so ordered.

[The following was received for the record:]

STATEMENT OF SENATOR PAUL S. SARBANES ON PROPOSED OPERATING POLICY FOR
NATIONAL AIRPORT

Mr. Chairman, I appreciate this opportunity to address the proposed Federal Aviation Administration operating policy for the future of Washington National Airport. This has been a matter of concern to me for some time; and I have corresponded with former Secretary of Transportation Brock Adams and his successor, Secretary Neil Goldschmidt, urging extensive revisions in the current operating policy at National. The Federal Aviation Administration now has developed a proposed operating policy which is a positive step forward but still does not adequately respond to the hardships imposed upon citizens of the Washington Metropolitan area. Specifically, I believe the proposed operating policy must be strengthened and clarified in three areas: Total annual volume of air passenger traffic, enforcement of curfew regulations, and citizen involvement on a continuing basis with regard to on-going operations.

The primary criteria for establishing a future operating policy at National Airport should be health and safety factors. The asserted convenience of National Airport should not be considered as a significant counterweight to these important factors, particularly since Washington and its environs are well-served by two other outstanding airports, Baltimore-Washington International and Dulles. Moreover, elected officials from throughout the region, representing a majority of National Airport's users, have strongly supported restrictions on the use of National reflecting their view of the impact of this facility on the quality of life throughout the Washington Metropolitan area.

The FAA is proposing to limit the volume of annual passenger traffic at National Airport to a total of approximately 18 million per year. This proposal would permit annually an additional 3 million passengers over current levels to utilize National Airport facilities. This growth in passenger traffic seems indefensible in view of the strains that have already been placed on airport facilities, vehicular access traffic, and upon the residents along the flight paths to and from National Airport. The automobile traffic congestion at National resulting from overuse already presents a safety hazard. Furthermore, this congestion impedes the normal flow of traffic throughout the metropolitan area by clogging important arterial routes. The continuous, heavy flow of passengers through National leads ultimately to extra late and early morning flights with the obvious hardships on residents of the area these flights represent.

To permit additional passenger usage at an already badly overcrowded airport might be justified if there were no other convenient air traffic facilities available. In this case, however, the Washington metropolitan region has two facilities, Dulles Airport and Baltimore-Washington International Airport, both of which are currently underutilized and capable of meeting the needs of additional air passenger traffic. In view of the capabilities possessed by BWI and Dulles, it would be more appropriate for the passenger volume at National Airport to be kept at or reduced below its present level.

Enforcement policy regarding curfews and extra flights is also of great importance. The proposals to permit no non-emergency airport operations before 7 a.m. and after 10:30 p.m. as well as strictly limiting the number of flights per hour are positive and important steps. However, these proposed policies will be ineffective unless the FAA is committed to a much more rigid enforcement policy than is presently the case. There are far too many examples of extra flight sections and late night flights which have taken place in apparent violation of the intent of the current rules. Therefore these new flight restrictions must be accompanied by a clear understanding that the rules governing the number of flights and their permissible times will be vigorously enforced.

To insure the proper operation of the airport in the future I have proposed along with other members of Congress from the Washington Metropolitan area, the establishment of a regional advisory board. Such a board would represent consumers, area residents, the regional airports, airlines, as well as the federal government in monitoring and evaluating the operations of National Airport. I again urge that steps be taken to establish such an advisory board in the near future.

As a federally owned and operated air transport facility National Airport should be a model of responsible management, responsive to serious health and safety concerns raised by the community. In order to achieve this ambitious goal, I urge the members of this Committee to avail themselves of the opportunity to assist the FAA in developing a safer, more rational operating policy for National Airport.

Mr. ANDERSON. Our next witness is Mr. Reginald W. Griffith, executive director, National Capital Planning Commission. We

have your statement, Mr. Griffith. It will be made a matter of record.

[The statement referred to follows:]

I, Mr. Griffith, do hereby certify that the following is a true and correct copy of the statement of Mr. Griffith, as given to me on the 1st day of January, 1901, at the City of New York, New York.

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NATIONAL CAPITAL PLANNING COMMISSION
1325 G STREET NW
WASHINGTON, D.C. 20576

STATEMENT

OF

REGINALD W. GRIFFITH
Executive Director

on

The Department of Transportation's
Proposed Policy for Metropolitan Washington's
Airports

Before the Subcommittee on Aviation
Committee on Public Works
and Transportation
U.S. House of Representatives

June 19, 1980

Mr. Chairman and members of the Subcommittee: My name is Reginald W. Griffith. I am the Executive Director of the National Capital Planning Commission. I appear before you today on behalf of the Commission and its Chairman, David M. Childs, who is out of the city. Accompanying me are Donald F. Barth, Associate Executive Director for Regional Affairs; Martin J. Rody, Director, Technical Services and Special Studies; and Daniel H. Shear, the Commission's General Counsel.

I appreciate very much the opportunity to briefly describe the Commission's functions as they relate to air transportation and to present the Commission's views on the Department of Transportation's Proposed Policy for Metropolitan Washington's Airports as described in its Supplement to the Draft Environmental Impact Statement dated January 1980.

As the central planning agency for the Federal government in the National Capital Region, the Commission has been deeply involved in air facilities

planning for the Washington metropolitan area - particularly Federal air facilities in the Region. In 1970 the Commission published "The 'Air Revolution' and the National Capital Region". The purpose of this staff report was to alert the region to the pending "revolution" in air travel and its potential impact on this area. The Commission requested, and Congress funded, in fiscal year 1972, a study of the future use of the air facilities serving the Nation's Capital. With passage of the 1972 Airways Act, the Commission and the Metropolitan Washington Council of Governments (COG) prepared a detailed design for a study of Washington's airports. The study was undertaken by COG with Federal financial assistance from FAA and this Commission. The results of the study are summarized in a report entitled "The Future of Washington's Airports" published in December 1975. The importance of this study lies in the alternatives evaluated:

- A. Baseline - Status Quo: No change in existing policy concerning Washington National Airport.
- B. Alternative 1 - Reduction in operations at National by 50% and transfer of flights to Dulles and BWI.
- C. Alternative 2 - Same as Alternative 1 with partial use of Andrews Air Force Base airfield for short haul aircraft.
- D. Alternative 3 - Prohibition of flights to National from cities within 250 miles of Washington to encourage use of railroad passenger service in the Northeast Corridor.

The report's major thrust is set forth in Chapters 8 and 9:

"The concept of three of the four alternatives is to limit aviation activity at Washington National as a means of reducing unacceptable levels of air pollution and noise, while recognizing that National is a very convenient airport for many citizens of the region and provides essential air transportation services. The role of National in the future is key to the entire regional air transportation system. An immediate action plan to reduce noise generated by current activity at National Airport is strongly recommended, along with requirements for

noise abatement plans and installation of noise monitoring systems at all three airports. The need for improved public transportation to Dulles Airport is reconfirmed in this report, based on the expected distribution of the regional air travel to that airport. Improved public transportation to Baltimore-Washington International will be required as well."

In accordance with the National Capital Planning Act of 1952, as amended, the Commission reviews master plans, site and building plans, and fiscal year capital budgets, and prepares a six year Federal capital improvement programs for the Region, including proposed Federal air facilities. In reviewing proposals for National Airport, the Commission has consistently, in recent years, requested a Master Plan for National; limitations on major airline terminal improvements to a five year period with a 30 day reversionary clause; and restrictions of improvements by FAA to only projects improving public safety or related to essential maintenance. The Commission has sought from FAA, for at least the last ten years, a policy statement on the future use of National Airport as context for evaluating a Master Plan for this facility.

The Commission began the preparation of a Federal Air Facilities element of the Comprehensive Plan for the National Capital about three years ago. Some of the preliminary materials, in addition to several studies I have already cited, were available to the Commission in its review of the 1978 and 1980 Draft EIS related to the Metropolitan Washington Airports Policy. In the interest of time, I will not review the Commission's comments on the 1978 Draft EIS. They are incorporated in full in a supporting statement entitled "Review of Previous Commission Actions" which is offered for the record.

Most recently, at its meeting on April 10, 1980, the Commission reviewed the latest proposed airport policy for the Washington area and authorized the

transmittal of its recommendations and comments to the Federal Aviation Administration. The Commission stated that it:

"believes that the adverse environmental and other impacts on the Nation's Capital of Washington National Airport, including operations thereof, warrant its discontinuance as a commercial airport at the earliest practical time and removal of flight operations to other new and/or existing airports in the Baltimore/Washington Bi-Region. Accordingly, the Commission requests that FAA submit a timetable for phasing out commercial airport operations at National Airport. Such a timetable should provide for completion of the phasing out by 1990 and should be submitted within six months to the Commission for its use in completing and adopting the Federal Air Facilities element of the Comprehensive Plan for the National Capital."

The Commission's position is based on the view that commercial aircraft operations at National have significant adverse environmental impacts on Federal interests in the National Capital. This is particularly true for the monumental core of the Capital where existing aircraft noise adversely affects the character and quality of the environment in the vicinity of the major monuments, memorials and other public activities on the Mall and the West and East Potomac Parks. Additional areas in the District of Columbia, Alexandria and Arlington and Fairfax Counties, in Virginia, and Montgomery and Prince George's Counties, in Maryland, are also adversely affected by aircraft noise.

It was not until the Commission's review of the "Metropolitan Washington Airports Policy - Supplement to the Draft Environmental Impact Statement - January, 1980"

that the potential noise impacts of National on the monumental core and adjacent areas were placed in a sharper focus. The Policy evaluated the following alternatives:

- a. Existing Conditions (No Policy Change)
- b. Proposed Policy
- c. Expanded Growth at National
- d. Restricted Growth at National

A careful examination of the estimated impacts of each of these alternatives indicates that at the present time total air carrier operations per day is 626; under the proposed policy, 466 in the year 1993; and under the restricted growth alternative, 343 by 1993. The average air carriers operations are now 39 per hour; proposed policy - 32 per hour; and with restrictive growth - 21 per hour. From Tables III-2 and V-8 in the Policy, the total daily and average hour air carrier operations under the restricted growth alternative were anticipated to be half the present conditions. Even by reducing the number of operations at National to one half its current operations as set forth in Exhibit A-10, much of the Federally owned parklands on both sides of the Potomac River from Alexandria to Georgetown, including the Mall with its national monuments and memorials, would be included in the 30 NEF noise contour. If the contour were recalculated to the actual hours of operation proposed (15) rather than the 24 hour period used in the formula to determine the sound print, it appears that the print shown on Exhibit A-10 is understated. The number of operations per day will vary the length of the sound contour but will have only a slight impact on its width.

Once the Commission understood the implications of noise physics as it related to the restricted growth alternative, it concluded that the noise impacts, generated on the area of the Nation's Capital containing Federal monuments and

lands adjacent to the Potomac and frequented by millions of tourists, foreign visitors and the local citizenry, could not be mitigated even by reducing the number of air carrier operations by 50% at National.

At the time that National was opened in 1941 the area surrounding the airport and its flight paths were largely vacant. In addition, two military airfields were across the river from National - both of which have since been phased-out of active use, except for an occasional helicopter of the Presidential fleet. What was once an ideal location to serve the Nation's Capital is now an anomaly. National was designed as a facility to accommodate propeller aircraft and serve a community of a million persons (1940 population of the National Capital Region). Few, if any, metropolitan cities in this country are now being served by an airport which was in use in 1940. With growth, the earlier airport locations became obsolete because of air and ground traffic congestion, safety hazards, noise impacts, and adverse impacts on adjacent land uses. They all became obsolete for the same reasons that National's location is obsolete - the tremendous increases in passenger volumes and the operating characteristics of the equipment now flying. National, because of its limited land area, was not capable of accommodating the landing and take-off requirements of the 4 engine jet. Nor were most close-in airports serving other major metropolitan cities in this country in the 1940 time-frame.

According to National's inaugural brochure (1941):

"The ... airport opened as the 'last word' in airports, a concentration of the ultramodern developments in design of buildings, handling of planes, air-traffic and field-traffic control, instrument landing, drainage, landscaping, air-traffic control, field lighting, facilities for public comfort and convenience, and surface vehicle traffic control...."

This cannot be said for National today.

The last major study of airport access and use, prepared under contract to U.S. DOT in 1968, determined that about 25% of the National air passengers were destined for or departing from downtown Washington. Another 22-23% were going to or leaving the remainder of the District. Arlington County accounted for 11%; the rest of the Virginia suburbs - 15%, and the Maryland suburbs - 19%. Based on this study about half of the air passengers had the District of Columbia as an originating or departing destination and the remainder of the region accounted for the other half. However, in terms of total trips, which includes air travellers, visitor trips associated with passengers, and airport employees, the study found that only 30% were attributable to the District of Columbia and 70% were trips within the Region outside of the District. (Arlington County - 11%; the rest of the Virginia suburbs - 29%; the Maryland suburbs - 20% and other - 10%). If a similar study were prepared today, with greater disbursement of Federal offices throughout the Region and the tremendous growth of office, commercial, and residential development in the suburbs, these percentages would be considerably greater for the suburban counties. Based on the findings of the 1968 study, National's supposed "convenient" location for serving the region as a whole is a myth and probably is even more so in 1980. National, by capturing the prime scheduling of the airlines serving this market, is forcing most (67%) of the air travellers to and from the Nation's Capital to use it whether convenient to them or not. Practically all of the cities served by National are not, or are inadequately, served by Dulles or BWI. Consequently, the air traveller is left with very little choice.

It is estimated that about as many persons visit the Lincoln Memorial annually as are destined to and from downtown Washington and National Airport. Does the

air traveller have more rights than the tourist visiting a national memorial? There can be alternatives for the air traveller; none are available to the tourist who wishes to visit the Lincoln Memorial.

The Commission believes that, in an era of jet aircraft and increasing air travel, National Airport is in the wrong place. The existing facilities are inadequate and will require a very large investment to modernize them. In long-range planning terms, National is an inappropriate location for a heavily used, traffic and noise generating airport. For these reasons, the Commission has recommended that FAA plan on the ultimate closing of National Airport to commercial aircraft with complete phasing out by 1990.

The Commission is aware of the problems associated with this recommendation. What happens to the passengers now using National? Can Dulles and BWI accommodate the 1990 passenger demands? Will a third airport still be needed to serve the Washington-Baltimore Bi-Region? Should the 1995 passenger projection demands be met? Can railroads serve the Northeast Corridor passengers more efficiently? What will be the impact of fuel costs on air travel? How should the National Airport site be used? By whom? These are all tough questions which can be addressed by FAA and the Commission in the Federal Air Facilities element of the Comprehensive Plan. However, unless Congress and the Executive Branch are serious about eliminating noise and air pollution from the Mall and Monumental areas of the Nation's Capital, the enjoyment and full use of this national resource can never be fully achieved.

Mr. Chairman, thank you for the opportunity to present this statement and submit these supporting documents. If you or other members of the subcommittee have any questions about the Commission's policies, I will attempt to answer them.

Mr. ANDERSON. Please proceed.

TESTIMONY OF REGINALD W. GRIFFITH, EXECUTIVE DIRECTOR, NATIONAL CAPITAL PLANNING COMMISSION, ACCOMPANIED BY DONALD F. BOZARTH, ASSOCIATE EXECUTIVE DIRECTOR FOR REGIONAL AFFAIRS; MARTIN J. RODY, DIRECTOR, TECHNICAL SERVICES AND SPECIAL STUDIES; AND DANIEL H. SHEAR, GENERAL COUNSEL

Mr. GRIFFITH. Thank you, Mr. Chairman.

Mr. Chairman and members of the subcommittee, my name is Reginald W. Griffith. I am the Executive Director of the National Capital Planning Commission. I appear before you today on behalf of the Commission and its Chairman, David M. Childs, who is out of the city.

Accompanying me are Mr. Donald Bozarth, the Associate Executive Director for Regional Affairs, on my left; Martin J. Rody, Director of Technical Services and Special Studies, on my immediate right, and Daniel H. Shear, the Commission's General Counsel, on my extreme right.

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As the central planning agency for the Federal Government in the National Capital Region, the Commission has been deeply involved in the air facilities planning for the Washington metropolitan area, particularly Federal air facilities in the region.

In 1970, the Commission published "The 'Air Revolution' and the National Capital Region". I have that document with me, Mr. Chairman. The purpose of this staff report was to alert the region to the pending revolution in air travel and its potential impact on this area. The Commission requested and the Congress funded, in fiscal year 1972, a study of the future use of air facilities serving the Nation's Capital. With passage of the 1972 Airways Act, the Commission and the Metropolitan Washington Council of Governments, COG, prepared a detailed design for a study of Washington's airports. The study was undertaken by COG with Federal financial assistance from FAA and this Commission. The results of the study are summarized in a report entitled, "The Future of Washington's Airports", published in December of 1975. I also have that report with me. The importance of this study lies in the alternatives evaluated, and there were four. First, baseline status quo, no change in the existing policy concerning Washington National Airport. Second, alternative 1, reduction in operations at National by 50 percent and transfer of flights to Dulles and Baltimore-Washington International. Third, alternative 2, the same as alternative 1 with partial use of Andrews Air Force Base airfield for short-haul aircraft. Fourth, alternative 3, prohibition of flights to National from cities within 250 miles of Washington to encourage use of railroad passenger service in the Northeast corridor.

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These are all tough questions which can be addressed by FAA and the Commission in the Federal air facilities element of the comprehensive plan.

However, unless Congress and the executive branch are serious about eliminating noise and air pollution from the Mall and the monumental areas of the Nation's Capital, the enjoyment and full use of this national resource can never be fully achieved.

Mr. Chairman, thank you for the opportunity to present this statement and submit these supporting documents. If you or other members of the subcommittee have any questions about the Commission's policies, I and my colleagues will attempt to answer them.

[Documents received for the file: The Air Resolution and the National Capital Region (January 1970); District of Columbia Downtown Heliport study (January 1973); The Future of Washington's Airports (December 1975).]

Mr. ANDERSON. Thank you, Mr. Griffith, for your presentation. Does your Commission represent the views of State and local government in the National Capital area, or is your Commission an independent Federal agency?

Mr. GRIFFITH. Our Commission is an independent Federal agency that has members from the States of Virginia and Maryland, along with the District of Columbia and other ex officio members of the Federal and District of Columbia governments.

Mr. ANDERSON. Was this Commission appointed by the President?

Mr. GRIFFITH. Three of our members are appointed by the President of the United States, two by the Mayor of the District of Columbia, and then the other ex officio members, by virtue of their Federal positions. They include the Department of Defense, the Administrator of the General Services Administration, and the Secretary of the Interior.

[The following additional information was received for the record from Mr. Griffith:]

NATIONAL CAPITAL PLANNING COMMISSION

1325 G STREET NW.

WASHINGTON, D.C. 20576

July 2, 1980

Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation
Committee on Public Works and Transportation
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

In response to a question during my testimony on June 19 before the Subcommittee on the Department of Transportation's Policy for Metropolitan Washington Airports, I failed to identify completely the membership of the National Capital Planning Commission.

The Commission membership is as follows:

Five citizen members, three of whom are appointed by the President and two of whom are appointed by the Mayor of the District of Columbia. The appointees of the Mayor are required to be residents of the District of Columbia. Of the three appointees of the President, at least one is required to be a resident of Virginia and at least one is required to be a resident of Maryland.

Ex officio,

Secretary of the Interior
Secretary of Defense
Administrator of General Services
Mayor of the District of Columbia
Chairman of the Council of the District of Columbia
Chairman, Committee on the District of Columbia, U. S. House
of Representatives
Chairman, Committee on Governmental Affairs, U. S. Senate

or their alternates.

I would appreciate very much the inclusion of this letter in the record of the hearings.

Sincerely,

Reginald W. Griffith
Reginald W. Griffith
Executive Director

Mr. ANDERSON. How does your function compare to that of COG?

Mr. GRIFFITH. COG has a regional planning function. It is made up of representatives from the various local jurisdictions within the region. COG is a non-Federal, if you want to put it that way, political body concerned with regional problems. The National Capital Planning Commission is a Federal agency. It is the central Federal planning agency for the National Capital region. There is some overlap, but we work very closely with COG.

Mr. ANDERSON. Does your position that National Airport be discontinued as a commercial airport contemplate that the airport would be closed completely, or would it remain open for general aviation?

Mr. GRIFFITH. That would require more study, but it contemplates there is a very good chance that it may need to remain open for general aviation and perhaps other functions that are noncommercial in character. The actual answer to that with respect to the extent of those flights would require a very careful study of the three airports, it would also involve a very real proposal that Metro access be extended to Dulles and that there be possible rail connections from both Baltimore and Washington to BWI.

Mr. ANDERSON. In making your recommendation on a policy for National Airport, did your Commission give any weight to public preference, and if so, could you describe the method by which you obtained the views of the public?

Mr. GRIFFITH. Our Commission at this stage gave great weight to public preference, through those members on the Commission that are appointed by the Mayor and speak for that constituency.

In addition, our Commission's meeting are public and open to the public for their consideration. With the publication and the circulation of our proposed Federal air facilities element we will be eliciting from the public at-large, as FAA has elicited from the public at-large for its policy statement, a great number of responses, and these also would be included.

Mr. ANDERSON. Correct me if I am wrong, but didn't COG recommend that the airport operations be cut in half, and—because I see that your membership is very similar. I was kind of surprised that COG would come out with a recommendation that the operations be cut in half, and you come out with the recommendation that it be discontinued entirely.

Mr. GRIFFITH. I will answer that and also call on my colleagues to answer that. It is not quite true when you say that the organizations are somewhat similar, Mr. Chairman. COG represents local interests and is therefore subject to a good deal of local pressure from the citizens of the various jurisdictions.

Mr. ANDERSON. Well, wouldn't those who are appointed by the local districts and the Governors and so on be subject to the same kind of pressure?

Mr. GRIFFITH. Not in the same manner, sir. We are concerned with the Federal interest, which hopefully is pursued in a manner that supports and actually promotes local interest. But if there is a conflict, if there is lack of togetherness in any way, then the Federal interest must prevail, from our Commission's point of view.

Mr. ANDERSON. Now, in reaching your position that National Airport should be closed at the earliest practical time, did you give

any consideration to the economic benefits of service to National, and if so, what weight was given to these benefits as compared to the adverse environmental effects?

Mr. GRIFFITH. We discussed that—the Commission discussed that during its meeting. Part of that discussion revealed that to the best of their knowledge, there has been no metropolitan area in this country that has in fact been able to undertake a very detailed and realistic cost-benefit analysis of the use of a facility, such as an airport, in this jurisdiction. There have been pieces of that kind of study done, but none totally.

The Commission, in terms of its own work program, is involved in something that may help that, but in terms of the economic impact, there is no question that there would be, with the closure of National, an economic impact on the immediate surrounding area in Virginia. But at the same time, the redirection of that traffic to Dulles and to BWI would have other economic effects. So that in terms of the total, there might be—we do not have the details on this—some balancing out.

Mr. ANDERSON. Does your Commission have any position on whether it is appropriate for the FAA to manage National and Dulles Airports or whether it would be more appropriate for these airports to be managed by local airport authority or a Federal corporation?

Mr. GRIFFITH. The Commission many years ago did consider this question, and at that time, the position was that National Airport and Dulles Airport should remain in the Federal family. Now, whether or not that would mean management by FAA or management by some other Federal entity was not addressed.

Mr. ANDERSON. Does your Commission suggest specific highway or mass transit projects which would improve access to Dulles Airport?

Mr. GRIFFITH. We suggest that Metro be extended to Dulles. The Commission strongly recommends that. That is not a project that we can control, as such. We can only advise and make recommendations.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Thank you, Mr. Chairman. Thank you, gentlemen. I am sorry I was late coming back. I think your testimony has contributed a lot. It shows we ought not turn this over to any local authority pretty positively.

You indicate on that the Commission stated that, " * * * the adverse environmental and other impacts on the Nation's Capital of Washington National Airport, including operations thereat. * * * " What are the other impacts?

Mr. RODY. Well, if you will talk to the people at the Park Service, many of the monuments on the Mall are beginning to crumble and break away. Some of that is due to vibration, some of that is due to air pollution. Not all is contributed by the airplane, some of it by the automobile, but because of the pollutants in the air, we are getting reaction on some of the monuments, and the limestone, other materials in them are beginning to crumble. It is a real problem.

Mr. SNYDER. That applies to the Capitol, too, doesn't it?

Mr. RODY. Yes, it does.

Mr. SNYDER. Doesn't your Commission reach any conclusion that Washington National provides any benefits?

Mr. GRIFFITH. The Commission recognizes that Washington National has for many years provided great benefits, both in terms of its economic impact on the surrounding community and its convenience. However, the Commission also recognizes that if we were planning an airport today for this Nation's Capital, it is most unlikely, if not impossible, that we would ever choose a site as close in to the central city as National Airport.

Mr. SNYDER. An organization known as the Committee for National prepares a brochure in which they say on the front of it, "Washington National provides a \$661 million boost to the economy." Do you agree with that?

Mr. GRIFFITH. As I said, Mr. Snyder, to the best of my knowledge, there is no—and I repeat—no comprehensive economic analysis of a facility of this kind in terms of its impact on its locality.

Mr. SNYDER. Well, maybe your Commission ought to familiarize itself with this study, which shows how many employees, and the rents, and the payrolls, and the tenant revenues, and all the rest that are involved out there.

Mr. GRIFFITH. Oh, I understand that. What I am saying is that it is not completely comprehensive.

Mr. SNYDER. Have you seen it?

Mr. GRIFFITH. The other thing—

Mr. SNYDER. Wait a minute. I want you to answer that question. Have you seen it?

Mr. GRIFFITH. No, I have not.

Mr. SNYDER. Well, how do you know it is not comprehensive, then?

Mr. GRIFFITH. Well, sir, you showed me a brochure—

Mr. SNYDER. But you have not seen it, and you tell me it is not comprehensive.

Mr. GRIFFITH. Yes, sir.

Mr. SNYDER. It may not be. I am not disputing your word. But I would say this to you, that you are not in a position to say it is not until you see it.

Mr. GRIFFITH. No, sir, I may not be. But practical experience suggests that in no way could a brochure of that size contain all of the implications with respect to economic impact.

Mr. SNYDER. All right. Let us talk about practical experience. You say, "At the time that National was opened in 1941, the area surrounding the airport and its flight paths were largely vacant." I was not here in 1941, but I assume that is accurate. Does that not indicate on the face that this vacant area has been developed notwithstanding the fact that National Airport was there?

Mr. GRIFFITH. The Washington-Baltimore corridor is one of the fastest, and I think for the last 2 years has been the second-fastest growing corridor in this Nation. National was designed without knowing that at the time. It was designed for a region of 1 million people. We now have nearly 3 million. This is irrespective of National. This just has to do with the economy of the region, sir.

Mr. SNYDER. Would the reporter please read the question to the witness? Apparently, he did not hear it correctly.

[Whereupon, the reporter read from the record as requested.]

Mr. GRIFFITH. Yes, Mr. Snyder, it indicates that the area was developed notwithstanding the fact that National was there.

Mr. SNYDER. Thank you. I was elected in 1962, came in January of 1963, and I have perceived monumental development of houses and other living accommodations, as well as office buildings that have grown up within what we call the footprint of National Airport. When I originally came here, I bought a house in Alexandria, subsequently sold that and bought one out at Baileys Crossroads, and about 7 years ago, I sold that and bought one here on the Hill. Now, in looking at real estate and attempting to find a place to go, and I wanted to get in closer each time, because of ground access and traffic more than anything else, I found that comparable housing increased in value about \$2,000 a mile, the closer you got to National Airport, than being on out in Virginia, out of the footprint.

Now, does that indicate that it is such a detriment to the community?

Mr. GRIFFITH. I do not believe that it indicates that it is of any benefit, other than a generator for economic development.

Mr. SNYDER. You are saying now that National Airport is a generator for economic development?

Mr. GRIFFITH. I am saying that any large transportation depot is a generator for economic development, yes.

Mr. SNYDER. Well, why would these people buy these houses and move in there if the airport constitutes such an adverse environmental effect upon them?

Mr. GRIFFITH. They may be doing it for convenience, they may be doing it for economic reasons, but many of these same people in that footprint are now complaining that the operations of National are adverse.

Mr. SNYDER. I do not question that. How far out does your planning agency's jurisdiction go?

Mr. GRIFFITH. The region of the National Capital, which is synonymous with the Washington, D.C. SMSA, except Charles County.

Mr. SNYDER. A couple of years ago we had hearings on allowing the Concorde to land and depart from Dulles, and we had a lot of folks complaining about the noise at Dulles that has been occurring. Again, I think Dulles was probably built way out in the country somewhere, and this development has occurred around it, subsequent to its being built, the same as it happened at National. But if we would accept your recommendation and close National by 1990, and move that traffic to BWI and Dulles, do you not anticipate that you would be in here then, because those people are complaining, and that growth in the next 10 years out there, because they did not like the noise?

Mr. GRIFFITH. Well, Mr. Snyder, at this time you are right, there is room for growth at Dulles. Ten years hence, who knows? It may be so developed that there would be people complaining.

Mr. SNYDER. But based upon your premise that the airport brings economic growth, the same thing is going to happen there that has already been happening to some extent and will be accelerated by moving all the traffic out there.

Mr. GRIFFITH. That is true, but we believe the functioning of this Nation's Capital from a Federal interest point of view would be improved.

Mr. RODY. Mr. Snyder, also, you have to realize that National Airport is on about a 600-acre site, a very tight site, admittedly, surrounded by the river. When the land for Dulles was purchased, FAA purchased at least a mile beyond each of the runways; it is a 10,000-acre site.

Mr. SNYDER. I am aware of that.

Mr. RODY. So the area cannot surround it as closely out at Dulles as it can National.

Mr. SNYDER. But nobody questions that they are going to move in as close as they can, regardless of which airport it is.

I think it is a fact of life that it will happen. I think the evidence of what has happened at National indicates that it has not been that adverse, and the advantages of living in closer to work or to the Capitol or whatever else it is have outweighed the adverse impacts of noise. You have other adverse situations that affect people. To me, I came to live on the Hill because of the adverse traffic problems of getting in here with a car. And I am convinced that closing National is not going to solve the problem. You are just going to move the problem. Now, to those people who live close to National, that will be an advantage. But they, by and large, have bought there since 1941, and even since 1967 when the slot allocation was made; I have just seen tremendous growth. People have moved in there knowing that airport was there, knowing jets were going in and out, since 1967, at least, or since I have been here in 1963. I just really do not understand that closing the airport solves any problem; it is just going to be moving it.

Mr. GRIFFITH. Well, Mr. Snyder, first of all, there is only one Nation's Capital in this country.

Mr. SNYDER. I am aware of that.

Mr. GRIFFITH. Within that Nation's Capital, there are certain resources—monuments, visited by people from all over the world—that cannot be placed any other place. National and only National, not any of the other airports, impacts on the tourists and the visitors visiting those monuments. That is one thing.

The other is that in terms of the concentration of Federal employees to run this Government, the need to move them on the road back and forth is more critical in this near downtown area than any other place in the region. And again, National and its traffic congestion, ground traffic, impacts on that.

Mr. SNYDER. I am well aware of the traffic problem. I have just indicated that. But you are just moving them from the 14th Street Bridge up to the one up north there, if they are going to Dulles, and you have got all these people on the road that much further. You compound the traffic problems, Mr. Griffith.

Mr. GRIFFITH. No, sir, not from our studies.

Mr. SNYDER. Sir?

Mr. GRIFFITH. No, sir, not from our studies in terms of the distribution of Federal workers, the use of Metro, the distribution of the Federal facilities. We believe the movement problem and therefore the functioning of the Government, the monument problem and therefore the appreciation of this Nation's Capital, would

be greatly improved if National Airport were closed to commercial traffic.

Mr. SNYDER. But you disagree with the concept that if you were going to move the same number of passengers out to an airport that is three times as far away that you are not compounding the traffic problem by moving the people out that much further?

Mr. GRIFFITH. No, sir, when the studies show that even in 1968, half of those people were coming from the region, and today, more than that.

Mr. SNYDER. But the same number of people are going to be coming from the region, and assume that roughly the same number or a greater number than we have now will be going to the airport.

Mr. GRIFFITH. But the operating airport would be placed further away, and therefore, would not interrupt—

Mr. SNYDER. That is right, so that each person who goes to the airport will travel 30 or 40 miles instead of 3 or 4?

Mr. GRIFFITH. But sir, we are talking about the difference of perhaps 7 to 20 minutes by Metro.

Mr. SNYDER. Who made your studies?

Mr. GRIFFITH. The National Capital Planning Commission makes many of these studies.

Mr. SNYDER. You made these studies in-house, with your own personnel; you did not contract out?

Mr. GRIFFITH. Some were in-house, some contracted out.

Mr. SNYDER. Are those studies available?

Mr. GRIFFITH. Yes, sir.

Mr. SNYDER. How voluminous are they?

Mr. GRIFFITH. We have submitted some things for the record. If, after reading those, if there is additional information that you want, we would be very happy to dig those out. But I believe what we submit should cover most of your questions.

Mr. SNYDER. Thank you.

Mr. ANDERSON. Mr. Fary?

Mr. FARY. I have no questions, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Griffith, Mr. Rody, Mr. Shear, and Mr. Bozarth. We appreciate your presentation.

Mr. ANDERSON. Our next witnesses are a panel, consisting of Mr. Frank J. Ward, assistant director, Department of Aviation, Houston, Tex.; Raymond Glumack, executive director, Metropolitan Airports Commission, Minneapolis, Minn.; Peter Daikos, assistant executive director, Norfolk Port and Industrial Authority, Norfolk, Va., and Marshall Arnold, director of air service, Louisville and Jefferson County Air Board, Louisville, Ky.

We have your prepared statements, and they will be made a matter of the record.

[The statements referred to follow:]

PRESENTATION
OF THE
CITY OF HOUSTON
DEPARTMENT OF AVIATION

BEFORE THE

U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
SUBCOMMITTEE ON AVIATION

June 11, 1980



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PRESENTATION OF
THE CITY OF HOUSTON
DEPARTMENT OF AVIATION

I. INTRODUCTION AND SUMMARY OF POSITION.

Mr. Chairman and members of the Subcommittee on Aviation, the City of Houston, through its Department of Aviation, welcomes the opportunity to present its views on the FAA's proposed rulemaking on Washington National and Dulles Airports.

On January 15, 1980, the Federal Aviation Administration issued a Notice of Proposed Policy together with proposed implementing regulations which would govern air carrier operations at Washington National Airport and at Dulles International Airport. One element of the FAA's proposed policy and rulemaking provides for the formal promulgation of a perimeter rule prohibiting nonstop operations to and from National Airport beyond an arbitrarily determined radius. Two alternative perimeters were proposed; one of 650 miles and the other of 1,000 miles.

The City of Houston strongly opposes the implementation of any nonstop mileage restriction at National Airport and submitted comments to the FAA on April 15, 1980 setting forth Houston's reasons therefor.

Houston believes that there should be no perimeter rule promulgated. National Airport is a unique national asset. It is the only airport providing close-in service to the nation's capital. Access to National Airport should be considered to be a national equity to be available to all cities on a fair, equal, and nondiscriminatory basis. The availability of nonstop service to National should not be limited to only a few cities which by mere geographic happenstance are located within an arbitrarily-determined perimeter. Rather, all cities in the country should be accorded the same opportunity to compete for the limited number of nonstop slots at National Airport.

As Houston will demonstrate below, any perimeter mileage rule, whether it is 650 miles or 1,000 miles, can serve no useful environmental or regulatory purpose. Whatever goals that the FAA seeks to accomplish by the imposition of a perimeter rule can be obtained through the other more direct regulatory restrictions that the FAA concurrently proposes to adopt. The formal promulgation of a nonstop mileage rule, a rule that has been informally followed since 1966, would simply perpetuate a misdirected artificial regulatory device that serves no sound public policy purpose.

The rule is designed to maintain National Airport's role as a short- and medium-haul airport. National Airport is not and never will be a short- and medium-haul airport.

Further, a perimeter rule could not effectively work to change the character of National Airport into a short- and medium-haul facility.

Moreover, the perimeter rule affirmatively works to the detriment of the public interest in a number of significant ways.

First, by unnecessarily invading and infringing carrier management decisional prerogatives, the perimeter rule patently violates the Federal Aviation Act as amended by the Airline Deregulation Act of 1978 which requires the CAB and the DOT/FAA to rely "to the maximum extent possible" on the disciplines of the competitive marketplace and not on the heavy hand of federal regulation.

Second, the rule arbitrarily and unnecessarily encourages air carrier inefficiency and misallocation of scarce resources. It inconveniences the travelling and shipping public by forcing the proliferation of time-consuming multi-stop service in markets that can support more and frequent nonstop service. It encourages the waste of fuel by requiring more landings and take-offs at intermediate points. Furthermore, the rule unfairly and unjustifiably discriminates against cities located beyond the perimeter.

As the operator of two major airports, the City of Houston is cognizant of the need to devise mechanisms to

alleviate the adverse impact of aircraft operations on communities which are adjacent to airports. However, the communities surrounding National Airport will not be served and the travelling public as a whole will be severely disserved by cosmetic palliatives, such as a perimeter rule, that cannot accomplish stated environmental or regulatory objectives.

The only effective means to curtail noise and other adverse environmental consequences at National and to modify the character of National Airport's operating role are through the actual operating limitations of the aircraft, the restrictions on frequencies and traffic, and the actual operating capabilities of the airport. Since the perimeter rules fails to achieve any useful public interest benefits, and, indeed produces significant adverse consequences, Houston urges that it be discarded.

However, if the DOT/FAA are determined to impose a perimeter rule, Houston proposed to the FAA, in its April 15 comments, an alternative rule that will fully meet the FAA's stated objectives and, at the same time, minimize the legal infirmities of the FAA's current proposals. Houston's proposed rule would be based on the maximum nonstop stage length at full payload of the aircraft types currently operating at National Airport; which equates to about 1,500 miles.

Although Houston prefers no rule, a 1,500-mile perimeter rule would have several important advantages over either a 650 or 1,000 mile rule. First, it would be a more

rationaly based standard keyed to the actual real-world physical operating limitations of current aircraft types. Therefore, by having an empirical premise, a 1,500-mile rule avoids the arbitrary irrationality of the 650-mile and 1,000-mile proposals which have no factual foundation. Second, Houston's proposal would be fully consistent with the stated (albeit in our view irrational and unattainable) objective of the FAA to maintain National as a short- and medium-haul airport. ^{1/} In this connection, extending the FAA's proposed 1,000 mile rule to 1,500 miles as we propose, would add only a very few additional cities to the list of cities that could be expected to receive nonstop service. Thus, the difference between a 650-mile or 1,000 mile rule on the one hand, and a 1,500-mile rule, on the other hand, would be insignificant in terms of the relative numbers of new nonstop flights at National and the impact on the character of National's operations. On the other hand, by extending the rule to 1,500 miles to reflect the operational limitations of the aircraft types now serving National Airport, the discriminatory infirmity of the FAA's proposals would be eliminated, since all cities to which carriers are physically capable of providing nonstop service would become eligible therefor.

^{1/} Although Houston believes this objective is not attainable through the imposition of any perimeter rule, Houston's alternative rule (1,500 miles) will work just as effectively as the two proposals set forth in the Proposed Rulemakings.

II. A PERIMETER RULE IS IRRATIONAL, ARBITRARY,
AND CAN SERVE NO USEFUL ENVIRONMENTAL OR REGULATORY PURPOSE.

National Airport is not now and never will be a short- or medium-haul airport and a perimeter rule will not make it one.

The current "informal" 650 mile perimeter rule was established in 1966. The rule was a compromise between the carriers then serving National Airport, which wanted to initiate jet operations there, and the Federal Aviation Administration, which feared that jet operations would create environmental problems and jeopardize the development of the recently completed Dulles International Airport. The rule was incorporated in an agreement among twelve scheduled air carriers serving National that was filed with and approved by the Civil Aeronautics Board for a duration of one year. 1/ The Agreement, which had the support of the FAA, provided for a gradual phase-in of jet services at National coupled with a restriction prohibiting the operation of jet aircraft on nonstop flights of more than 650 miles, with the exception of seven "grandfather" cities. 2/ The seven cities were exempt because they were

1/ Agreement CAB No. 187-81, CAB Order E-23743, May 25, 1966.

2/ The grandfather cities were Minneapolis/St. Paul, St. Louis, Memphis, Tampa, Orlando, Miami and West Palm Beach.

then receiving nonstop service by propeller aircraft. By its terms, the agreement expired on April 24, 1967; however, the 650 mile nonstop rule continues to be adhered to by all National Airport carriers and by the FAA in its administration of National Airport.

Thus, was born a rule which in fact has served no public interest purpose; a rule that unfairly and unnecessarily subjects cities such as Houston to inferior service to the nation's capital.

The only stated objective of a mileage perimeter contained in the FAA's Notices of Proposed Policy and Rulemaking is that it is "necessary to preserve National Airport's 'medium/short-haul' and local service role as distinct from the so-called 'long-haul' international role of Dulles Airport." This rationale is utter nonsense.

A. National Is Not Now And Never Will Be A Short-Or Medium-Haul Airport.

The distinction between National Airport as a "short-haul airport" and Dulles International Airport as the "long-haul airport" is both fallacious and unrealistic. In the first place, short-haul/long-haul functional distinctions for airports that are served by two and three engine jet aircraft are at best illusory, at worst irrational, and certainly cannot be attained through the imposition of a nonstop mileage restriction. History under the operation

of the existing "informal" 650-mile perimeter rule bears this out.

The 650-mile rule has not made National Airport a short- or medium-haul airport. National Airport serves the same long-haul markets that Dulles serves and in many cases with substantially more frequencies. Thus, there are as many if not more services available between National Airport and cities located beyond the 650-mile zone as are offered from Dulles to those same cities. In the Houston-Washington D.C. market, for example, there are twice as many single plane services to and from National Airport than there are single plane services to and from Dulles Airport. The same situation prevails in the Dallas/Fort Worth-Washington market. Moreover, over 40% of the cities that receive single plane service from National Airport are located beyond the 650-mile perimeter. Of the approximately 120 cities that receive single plane service to and from National Airport, approximately 50 such cities are located beyond the 650-mile zone. ^{1/} Indeed, approximately one-quarter of those cities are located more than 1,000 miles from National Airport. Daily direct service is offered between National Airport and such long-haul transcontinental cities as Los Angeles, San Francisco, Ontario (California), Seattle,

^{1/} Official Airline Guide, North America Edition, April 1980.

Portland (Oregon), Spokane, Las Vegas, Tulsa, Oklahoma City and Denver, to name just a few.

It is clear, that the existing 650-mile rule has not effectively limited National Airport's role to that of a short- or medium-haul airport, and it never will!

There is only one effective way to ensure that National Airport will function as a short- or medium-haul airport and that is to prohibit entirely all operations (nonstop, one-stop or multi-stop) beyond a certain mileage perimeter. Houston does not propose such a preposterous course of action. It is mentioned simply to highlight the inanity of trying to maintain a functional distinction between National and Dulles Airports.

B. Dulles International Airport Does Not Need Regulatory Devices Aimed at Redistributing Traffic and Service to Assure Its Development.

As the foregoing discussion established beyond peradventure, the existing perimeter rule has not resulted in shifting service and/or traffic from National Airport to Dulles Airport. However, assuming arguendo that such redistribution had occurred and further that such redistribution was in the public interest, Dulles International has long since past the time when its growth and development need protection.

The FAA's own figures as set forth in the Supplement to the Draft Environmental Impact Statement, dated January

1980, reveal the striking growth that Dulles has experienced over the last decade. Dulles has grown from 538,000 passengers in 1966 (the year the 650-mile rule was first instituted) to over 3.5 million annual air passengers as of September 1979. 1/ Moreover, during peak periods of the day, when most airline operations are scheduled, the terminal facility is completely saturated, well exceeding its capacity of 1,800 passengers per hour. 2/ Although the air side capacity of Dulles Airport has not been reached, if the terminal capacity is stretched to its limit, air side capacity becomes irrelevant. The multi-million dollar terminal expansion program currently underway at Dulles is ample testimony to the fact that Dulles airport no longer needs protection to assure its future growth.

1/ FAA Environmental Impact Statement, Supplement (hereinafter referred to as EISS) Page II-5.

2/ Id.

III. A PERIMETER RULE IS UNDULY DISCRIMINATORY AND ANTI-COMPETITIVE.

The United States Department of Transportation and the Federal Aviation Administration as the administrators of the metropolitan Washington airports are prohibited by law from taking action which unduly discriminates against certain localities or citizens. A perimeter rule which allows certain localities to receive nonstop service to and from National and which prohibits other localities from receiving similar nonstop service is per se discriminatory. Any such discrimination will not withstand judicial scrutiny unless there are substantial and legitimate public policy reasons for it. As the previous section demonstrates, there are no justifiable public policy grounds for imposing a perimeter rule.

The FAA's notice of proposed policy contains five policy elements.

1. Limitations on "air carrier" schedules;
2. Limitations on commuter carrier schedules;
3. Imposition of curfews at National Airport;
4. Imposition of a perimeter rule; and
5. Authorization of two and three-engine wide bodied aircraft. 1/

1/ See EISS at II-VII.

Policy elements 1, 2, 3, and 5 will affect all citizens and service to all locales throughout the country on an equal, non-discriminatory basis, and can be supported by legitimate environmental and/or safety justifications.

The perimeter rule, however, is the one glaring exception. The rule is unsupported by any rational grounds. Moreover, the rule discriminates arbitrarily and unfairly in favor of cities located within the permissible zone and deprives cities located outside the zone of the quantity and quality of air service they need and can support to the nation's capital.

It makes no sense to preclude forever a city from receiving nonstop access to the capital's close-in airport simply because it lies beyond a zone which was arbitrarily selected on the basis of nonstop service that was provided in 1966. The fact that there are seven "grandfather" cities that are located beyond the 650-mile perimeter and receive nonstop service to National Airport underscores the severity of the discrimination and the mischief that results from imposition of an arbitrary rule.

Adoption of a 1,000-mile rule instead of a 650-mile rule will not eliminate the discrimination; it will compound it. The premise for adopting a 1,000-mile rule is based

on the approximate distance of the furthest grandfather city, Minneapolis. By adding more cities to the permissible zone and by cutting off the extended perimeter, without any rational empirical basis, the discriminatory affect on cities, like Houston, that are located outside, but proximate to the new perimeter, is made more perverse.

Furthermore, a perimeter rule, be it 650-miles or 1,000-miles is anti-competitive, particularly when considered in the context of the existing anti-competitive slot allocation procedures at National Airport. The perimeter rule enhances the cartel-like environment at National Airport in which entrenched incumbents that have historically served east-coast cities within the perimeter have a significant competitive advantage over new entrants and in many instances can effectively preclude new entry into the Washington D.C. market.

To a substantial portion of long-haul passengers, the convenience of close-in National Airport to downtown Washington, when balanced against the 25-30 mile commute from Dulles or BWI, outweighs the convenience of nonstop service provided at the outlying airports. As a consequence, the carriers that have large service complexes at major hubs located within the perimeter have the economic incentive to funnel long-haul traffic between National Airport

and long-haul cities beyond the zone over those intermediate points. Thus, cities like Atlanta and Chicago and Jacksonville and Memphis have artificially enhanced nonstop service levels, substantially supported by long-haul passengers destined to or originating from such points as Houston and Dallas/Fort Worth. Conversely, long-haul cities like Houston have artificially depressed nonstop service levels. (See, Table at p.17.)

New carriers desiring to enter Washington, D.C. long-haul markets have two alternatives. They can either operate nonstop service from the outlying airports at Dulles or B.W.I. and/or serve National Airport on a one- or multi-stop basis. Either way new carriers are placed at a competitive disadvantage. First, as noted above, National is competitively more attractive to passengers because of its close proximity to downtown Washington than the two outlying airports and the traffic figures bear this out. Second, in order for new long-haul entrants to be successful at National they, in effect, must enter at least two new markets; the National Airport long-haul market and the intermediate point markets located within the perimeter. The entrenched incumbents that have been serving the intermediate markets for decades have a clear competitive advantage. This is borne out by the fact that there has been no new entry between Washington and such points as Atlanta, Chicago, Memphis, etc.

Eliminating a perimeter rule will allow the operational limitations of National Airport in the context of applicable slot allocation and frequency restrictions to determine where and to what extent service will be provided. New entrants as well as existing carriers will then have an equal opportunity to compete against each other without undue advantages, and the consumer will receive far better service and lower fares unencumbered by artificial regulatory restraints.

IV. PERIMETER RULES PRODUCE SIGNIFICANT ADVERSE ECONOMIC AND ENVIRONMENTAL CONSEQUENCES.

The 650-mile rule has produced significant adverse public interest consequences, by impeding air commerce, inconveniencing millions of passengers, producing air carrier inefficiency, and encouraging waste of fuel.

A. A Perimeter Rule Impairs the Quality of Service to Many Cities and Inconveniences the Travelling Public.

The 650-mile rule has forced millions of passengers a year to utilize inconvenient and time-consuming one- and multi-stop services in long-haul markets that need and can support higher levels of nonstop service.

The Washington-Houston market is a case in point. In 1979, the Houston-Washington market generated almost 250,000 O&D plus connecting passengers. ^{1/} Despite its large size, and the fact that it is served by seven airlines, the Houston-Washington, D.C. market receives only five daily nonstop roundtrips; four of which serve Dulles and one serves BWI. Markets of this size typically receive more than twice as much nonstop service as the following table illustrates:

^{1/} CAB Origin and Destination Survey, Tables 8 and 10.

TABLE

<u>Market</u>	<u>Nonstop Roundtrips</u>
Houston-Chicago	11
Houston-Atlanta	13
Houston-Los Angeles	10
Houston-Miami	12
Houston-Denver	14
HOUSTON-WASHINGTON	5

The limited number of nonstop frequencies are the product of a number of factors including the greater attractiveness of close-in National Airport, the prohibition against nonstop Houston-Washington service at National Airport, and the resultant large number of one and multi-stop frequencies between Washington National Airport and Houston transitting intermediate points. More than twice as much service is provided on a one- and multi-stop basis from National than on a nonstop basis at the other airports. Millions of passengers are forced to endure unnecessary travel delays as a direct result of the perimeter rule. These enroute delays not only produce inconvenience to travellers but impose an economic cost (in terms of lost opportunity costs) of untold millions of dollars a year.

Houston's situation is not atypical: It is faced by numerous cities throughout the country that, by geographic happenstance, fall beyond the permissible nonstop zone. Houston's story can be told with equal conviction by the citizens of Dallas/Fort Worth, Denver and Las Vegas to name

only a few. It is unfair to allow a few specially selected cities that are located within the "magic" 650-mile zone to have artificially enhanced, higher levels of nonstop service to the nation's capital and to force cities that can independently generate traffic sufficient to support more nonstop service to funnel their citizens via inconvenient and circuitous routings.

B. The Perimeter Rule Creates Economic and Environmental Inefficiencies.

By prohibiting nonstop service to long-haul points that are now served by National Airport, the perimeter rule impairs optimal economic efficiency, increases the cost of service, and impairs the environment and energy conservation.

Today's two and three engine jet aircraft are designed to operate at peak efficiency over long-haul routes, in excess of 650 miles. Unit costs tend to decline as stage length increases. A perimeter rule impedes the airline from achieving maximum economic efficiencies. Furthermore, the perimeter rule artificially encourages carriers to make enroute stops at intermediate points that are not otherwise required by market demand. These forced stops waste untold millions of gallons of the precious fuel and increase noise and air pollution. These economic and environmental inefficiencies will be exacerbated if widebody aircraft are permitted to serve National as the FAA proposes.

By impeding optimal performance and by requiring the added consumption of fuel the perimeter rule increases the cost of service and impairs the carriers' ability to offer "a variety of adequate, economic, efficient and low-price services by air carriers without unjust discriminations, undue preferences or advantages." 1/

1/ Section 102 of the Federal Aviation Act, as amended.

V. IMPOSITION OF A PERIMETER RULE VIOLATES
UNITED STATES AVIATION POLICY.

A perimeter rule is, in Houston's view, totally at odds with the Department of Transportation's statutory mandate to promote, encourage and develop aeronautics and with the mandate underlying the Airline Deregulation Act of 1978 which directed the U.S. aviation authorities to place "maximum reliance on competitive market forces" and minimal reliance on the heavy hand of federal regulation.

The 650-mile or 1,000-mile rule unnecessarily infringes on the prerogatives of carrier management. All regulatory interventions should be drawn as narrowly as possible consistent with desired and attainable regulatory goals. The objectives of the rule as announced by the FAA

"To rationalize the role and use of the
two airports from an overall transportation
viewpoint"

are not attainable through artificial regulatory devices. Rather, those objectives can best be accomplished through reliance on the disciplines of the competitive market place.

So long as the carriers operating at National Airport continue to be constrained by valid environmental and safety restrictions such as frequency limitations, passenger volume limitations, aircraft limitations,

curfews, and the like, it is senseless to impose a restriction which inhibits carriers from properly serving the travelling and shipping public and which dictates to the airlines how and where carriers can operate nonstop service.

The environmental and safety parameters will be established by curfews, frequencies and volume restrictions, etc. Within these parameters, carrier management should be free to determine how best to meet the demands of the travelling public. No amount of regulation will effectively change the character of National Airport into a short-haul facility and it would be the height of folly to think it would.

VI. ELIMINATION OF A PERIMETER RULE WILL NOT
PRODUCE ADVERSE ENVIRONMENTAL CONSEQUENCES.

The FAA is justifiably concerned about adverse environmental and safety effects of service at National Airport. Those impacts, however, will be effectively addressed by the proposals to limit the number of aircraft movements, to impose a curfew, to put a cap on passenger generation.

The perimeter rule serves no environmental purpose and none is espoused by the FAA in its proposed rulemakings. The noise and emission pollution differentials between a National Airport-Atlanta or a National-New Orleans operation, on the one hand, and a National Airport-Houston operation, on the other hand, are imperceptible by man or machine.

VII. THE FAA CAN MINIMIZE THE DISCRIMINATORY AND ARBITRARY INFIRMITIES OF ITS PROPOSALS BY BASING THE PERIMETER RULE ON THE PHYSICAL OPERATING LIMITATIONS OF THE AIRCRAFT TYPES NOW SERVING NATIONAL AIRPORT.

As discussed in subsequent sections, Houston believes that the two alternative perimeter rules proposed by the FAA are legally invalid because they are irrational, arbitrary and unduly discriminatory. Although Houston's view is that no perimeter rule should be imposed, if the FAA is determined to impose one, many of the legal infirmities inherent in its proposals can be avoided by grounding the rule on real-world physical constraints of the aircraft now serving National.

The longest range of the commercial aircraft now operating at National in a maximum payload condition is about 1,500 miles. A 1,500-mile rule would have the important virtue of being empirically premised on real-world conditions. It would avoid the unsupported irrationality of the 650-mile or 1,000-mile rules. Moreover, a 1,500-mile rule would not exclude cities to which the airlines are physically capable of providing nonstop service; yet, only a very few cities would be added to the list of cities eligible for nonstop service.

Thus, a 1,500-mile rule would eliminate the illegal discrimination inherent in the FAA's proposals without

significantly affecting the nature or character of National's operations. At most, only a handful of nonstop services might be provided to the few additional cities, and those services will continue to be constrained by the overall frequency, passenger volume, aircraft and other restrictions imposed by the FAA.

Moreover, 1,500 miles is the threshold where maximum payload performance is reached for two and three-engine jet aircraft. Thus, a rule keyed to that threshold would be conducive to optimizing air carrier economic efficiency and fuel conservation.

The 650-mile or 1,000-mile proposals are patently discriminatory because they exclude longer-distanced cities without any empirical evidence to show that nonstop service to points beyond would impair soundly based objectives. On the other hand, under a 1,500-mile rule, cities that would be excluded could take some comfort in the fact that aircraft now operating at National could not offer them nonstop service anyway.

In sum, if a perimeter rule is to be adopted, Houston urges the adoption of a rule based on the physical limitations of the current aircraft types serving National. A 1,500-mile rule would be more rational and less discriminatory than either a 650-mile or 1,000-mile rule.

VIII. CONCLUSION

The 650-mile nonstop limitation is an anomaly. It was designed to achieve a purpose of dubious merit and one that can never be fulfilled -- to make National Airport a strictly short-haul facility. The rule in fact results in poorer service to cities which need and can support more nonstop service and forces millions of passengers to endure the delay and inconvenience of unnecessary transit stops. The rule unfairly discriminates against cities located beyond the permissible zone, improperly invades carrier management prerogatives, and wastes precious fuel.

Houston has urged the FAA to eliminate the perimeter rule at National Airport to permit equal and equitable access to National Airport for all cities, not just a chosen few or those that happen to be located within an arbitrarily-drawn boundary.

Houston asks that Congress, through this Subcommittee urge the FAA to abandon its proposal to impose a perimeter rule at Washington National Airport.

TESTIMONY OF

RAYMOND G. GLUMACK, EXECUTIVE DIRECTOR
MINNEAPOLIS-SAINT PAUL METROPOLITAN AIRPORTS COMMISSION

IN SUPPORT OF NON-STOP TWIN CITIES/WASHINGTON NATIONAL AIR SERVICE

Before the
Aviation Subcommittee of the Public Works Committee
U.S. House of Representatives
June 19, 1980

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE:

My name is Raymond Glumack, Executive Director of the Minneapolis-Saint Paul Metropolitan Airports Commission.

The Minneapolis-Saint Paul Metropolitan Airports Commission, an arm of the Minnesota Legislature, owns and operates an integrated system of airports located within the seven-county area encompassing the Twin Cities of Minneapolis-Saint Paul and suburbs. This system of airports is comprised of six reliever airports and one major hub air carrier airport that serves the air transportation needs of the citizens of the Upper Midwest Tier of States. Based on operations, this system of airports is the third busiest in the nation with 1,161,595 air movements in 1979. As a comparison, the busiest airport system in the nation is Los Angeles with approximately 1.3 Million operations performed within their five airport system. The Minneapolis-Saint Paul International Airport acts as the collecting point, or hub, for the citizens of all of Minnesota, North and South Dakota, major parts of Montana, Iowa, Nebraska, Wisconsin, Upper Michigan, and Southern Ontario, and is an international gateway with service to and from the Orient and Europe. In addition, many of the Fortune 500 corporations are located in the Twin Cities area, especially those engaged in the food processing/agri-business industries and the computer/high technology

field. These many, large and important firms have a substantial reliance on our airport system for the conduct of their domestic and international business.

These factors - the size of the area served through this hub, the numbers and importance of industry and commerce located within the trade area, and the remoteness due to long distances - are the prime reasons for the Upper Midwest's unusually strong reliance on air commerce to meet its transportation needs.

For the same reasons the Upper Midwest must totally rely on air transportation to serve its essential needs for efficient access to the nation's capitol. As evidence of the heavy demand, three airlines, Northwest and Republic Airlines (two home-based carriers) and Western Airlines provide the service. Additionally, the utilization of the existing schedules is most impressive.

Transferring the air service to and from Minneapolis-Saint Paul to Washington, D.C. from the Washington National Airport to any other facility would, indeed, be a most serious disservice to the Upper Midwest. The airplane is a long-haul vehicle and its efficiencies are best realized in long-range utilization. Long-range operations are the best suited for Washington National Airport for many very good reasons, prime among which is "fairness". Those U.S. citizens who live great distances from Washington, D.C. are entitled to equal access to the nation's capitol as those who live "close-in". The time, energy, and money savings through the utilization of Washington National Airport in a small way compensates for the disadvantages of residing in states distant from Washington, D.C. On the other hand, U.S. citizens fortunate enough to reside in "close-in" states are best suited to use Dulles or Baltimore Washington Airport. The ground travel time from these airports to places of business in the nation's

capitol most likely will seldom approach the total elapsed time from those arriving from long distances. If restrictions become absolutely necessary, the FAA should divert "short-haul" traffic to these facilities.

Minneapolis-Saint Paul International Airport, like Washington National Airport, is a "close-in" airport. These two facilities share many environmental problems, the most serious of which is aircraft noise. Our experience in the Twin Cities has proven that air commerce and a "close-in" airport can live in reasonable compatibility with its neighbors without reducing operations at the airport or handicapping the ability of air commerce to serve the vital travel needs of the public.

The Minneapolis-Saint Paul Metropolitan Airports Commission, together with the airlines serving the airport, in a spirit of innovative cooperation with the residents of the noise impacted areas and the FAA, promulgated a noise abatement council called the Metropolitan Aircraft Sound Abatement Council (MASAC). This totally unique organization, in a rare setting of cooperation between the industry and public, has developed a reputation founded upon accomplishment and has become a model for the rest of the country.

Among the 17 noise abatement procedures (which have been developed by MASAC and implemented through joint efforts of the MAC, the airlines, and the FAA without limiting the operational capability of the airport to meet the essential air transportation needs of the Upper Midwest) is a highly effective preferential approach and departure program utilizing flight tracks over the less densely populated areas.

Field rules have been written to control maintenance run-ups resulting in a 95% decrease in run-up complaints. Berms have been

constructed along the west boundary of the airport, virtually eliminating complaints from residents immediately adjacent to the airport.

Northwest Airlines, Republic Airlines, MASAC and MAC have developed new take-off procedures that get aircraft to high altitudes earlier permitting substantial power reductions over populated areas. Each segment of the 17 point program has contributed in varying degrees in a very positive way toward aircraft noise attenuation. However, the single most dramatic contribution has been a carefully developed support program encouraging Minneapolis-Saint Paul airlines to acquire and operate wide-body jets into and out of our air carrier airport. The airline response was excellent. Older narrow-body aircraft were taken from flight schedules wherever possible and wide-bodies were scheduled in their places as soon as possible.

To mention one company, Northwest Airlines over the years acquired a most impressive fleet of wide-body aircraft. The result, as the transition from narrow-body to wide-body aircraft continued, was a most impressive increase in the numbers of passengers handled in a substantially less number of operations AND IN MUCH QUIETER AIRCRAFT. In our opinion, it is impossible to overstate both the operational and environmental benefits resulting from this very positive step.

These are some of the programs that have, in fact, reduced many of the negative impacts of aircraft operations and yet at the same time have allowed the airport to function to its greatest potential which is also in the public's best interest.

We believe that the FAA can best serve the nation and the airport neighbors living in noise impacted areas of Washington National Airport by devising programs such as those in effect at Minneapolis and Saint Paul.

In this manner the FAA would be offering the airport neighbors true relief without crippling air commerce through serious restrictions and capacity limitations.

Attached is a Minneapolis-Saint Paul Metropolitan Airports Commission resolution supporting the continuation of present non-stop Twin Cities/Washington National air service. As the resolution states, we believe there are answers to Washington National's serious environmental problems and our airport stands in evidence of this belief. We believe that the answer is not in the restriction of operations and capacity restraints. We further believe Washington National Airport can best serve the nation by assigning "long-haul traffic" a priority need.

MINNEAPOLIS-SAINT PAUL
METROPOLITAN AIRPORTS COMMISSION

RESOLUTION NO. 1081

RE:

NON-STOP TWIN CITIES - WASHINGTON NATIONAL AIR SERVICE

WHEREAS, it is the statutory duty of this Commission to promote and serve the public interest, convenience and necessity by promoting both national and international air transportation in and through the State of Minnesota, and to assure the inclusion of the State of Minnesota in national and international programs of air transportation, and

WHEREAS, non-stop air service has occurred between Minneapolis-Saint Paul International Airport and Washington National Airport of the Washington, D.C. area for many years, and

WHEREAS, there is a very substantial community of interest between the State of Minnesota and Washington, D.C. requiring time-saving, non-stop air service to Washington National Airport for the whole range of governmental, business, commercial and public reasons, and

WHEREAS, this air service is vital also to the interests of the States of North Dakota, South Dakota and Montana; parts of the States of Iowa, Nebraska and Wisconsin; and other States located along the Northern Tier area of the country which do not have air service to Washington National Airport and rely on the current service between Minneapolis-Saint Paul International Airport and Washington National Airport for timely and efficient air service to the nation's capitol for the conduct of the whole range of public and private business, and

WHEREAS, there is currently an environmental proposal to the Federal Aviation Administration of the United States Department of Transportation which could jeopardize this very essential air service link between the entire Upper Midwest/Northern Tier area of the nation and Washington, D.C., and

WHEREAS, a reduction of operations at Washington National Airport by eliminating current non-stop air routes with the longest stage-length would not only be discriminatory, but also would eliminate such service to those areas of the nation most in need of continued service due to both the distance required to travel to the nation's capitol and the large, multi-state geographical areas of the nation served by routes such as the Minneapolis-Saint Paul non-stop service to and from Washington National Airport, and

WHEREAS, Minneapolis-Saint Paul International Airport, like Washington National Airport, is a close-in airport geographically located within a major urban population center and has had to deal with environmental capacity concerns similar to those at Washington National Airport, and

WHEREAS, Minneapolis-Saint Paul Metropolitan Airports Commission, working jointly with representatives of the U.S. Federal Aviation Administration and our two home-based airlines, developed creative and workable solutions to environmental capacity constraints due to aircraft noise such that operational cutbacks or moratoriums were unnecessary,

THEREFORE, BE IT RESOLVED that the Minneapolis-Saint Paul Metropolitan Airports Commission, acting in behalf of the citizens of the Minneapolis-Saint Paul Metropolitan Area and the State of Minnesota, vigorously opposes cutbacks in scheduled operations at Washington National Airport as an acceptable means of addressing environmental capacity concerns at that airport, and

BE IT FURTHER RESOLVED that if scheduled operations reductions should be made at Washington National Airport for any reason, that such cutbacks should either be made equitably among all points presently served by non-stop air service to Washington National Airport or among those points with the shortest air distance to Washington National Airport which would have less travel time to Washington, D.C. even via alternate air routes than do those points with the longest current non-stop air routes to Washington National Airport, and

BE IT FURTHER RESOLVED that copies of this resolution be transmitted to the Secretary of the United States Department of Transportation, the Administrator of the Federal Aviation Administration, the Governor of the State of Minnesota, and the Congressional Delegation of the State of Minnesota.

Remarks of Peter R. Daikos
Deputy for Trade Development
Norfolk Port & Industrial Authority
Norfolk, Virginia

Subcommittee on Aviation
House Committee on Public Works & Transportation
June 19, 1980

I am Peter R. Daikos, Deputy for Trade Development for the Norfolk Port and Industrial Authority, Norfolk, Virginia. The Port Authority owns and operates Norfolk International Airport, which serves a population of 1.3 million people in Southeast Virginia and Northeast North Carolina.

I appreciate the opportunity to appear here today on behalf of the 200,000 plus passengers who travel annually between Norfolk International Airport and Washington National Airport. This figure of 200,000 passengers represents ten (10) percent of Norfolk International Airport's O+D activity. It is also our second largest market and Washington's 13th largest market.

First of all we see Washington National Airport as the short to medium range airport that serves Washington, D.C. The close proximity of downtown Washington lends itself to that roll. Washington Dulles International Airport, some 30 miles from downtown Washington, is the long haul and international airport. That is the roll it should play and continue to play. BWI, or Baltimore Washington International Airport, is also located some 30 miles from downtown Washington. This airport serves Baltimore and the Washington D.C. suburbs of Maryland, not downtown Washington.

After reviewing notice of F.A.A.'s proposed D 19950 and notice of proposed rulemaking D 19948.

Much of what I described of Washington National Airport is going to be destroyed by these two proposed policies as it relates to high density markets within 300 miles of Washington National Airport.

We are all aware that the F.A.A. is suggesting that a bid procedure be implemented and all carriers bid for the right for the slots in question.

When the bidding of these slots becomes intense, which it will, carriers who operate on the longer haul routes will be the only ones who will be able to pay for those flights. Let me give you an example. Piedmont operates 112 passenger B-737 aircraft which it utilizes on the Washington-Norfolk run. The coach fare less (8%) eight percent federal tax is \$54.63 x 112 passengers. The revenue on board is \$6,118.56. Eastern operates nonstop Washington-Miami with 727-200 aircraft. To keep this on an apple for apple basis, let's say they have 112 passengers. The coach fare DCA to MIA is \$145.37. The revenue is \$16,281.44, almost three times as much as what Piedmont or USAir can generate per departure Washington to Norfolk. For prime time slots it is obvious that Eastern to Miami will be able to afford to pay the premium fee that a bidding process is going to create.

Carriers who have larger aircraft and who serve routes in the medium to long range are going to benefit. Carriers such as USAir and Piedmont who have aircraft that have passenger capacities of a little over 100 and who serve the short haul routes will be hurt as well as nine of the (30) thirty top cities in terms of O+D ranking for Washington, all within 300 miles of National Airport. They are Pittsburgh (9th), Raleigh (12th), Norfolk (13th), Buffalo (19th), Philadelphia (21st), Rochester (22nd), Syracuse (24th), Roanoke (29th), and Richmond (30th), or over a million passengers. This does not take into consideration the passenger who utilizes DCA as a connecting hub. The one million includes local passengers only.

An example. Two of the four USAir Norfolk-Washington flights continue on to Detroit, giving Norfolk-Detroit onestop service which is a major market to our area due to a very large Ford light truck assembly plant in Norfolk. I doubt very much if we would have this type of service if it were not for the Norfolk-Washington routing.

USAir in Washington is a primary hub for Norfolk. It allows the traveler from Southeast Virginia and Northeast North Carolina to connect to other USAir destinations such as Albany, Buffalo, Cincinnati, Columbus, Hartford, Islip, Pittsburgh, Providence, Rochester, and Syracuse.

Piedmont tags Norfolk on several of its key markets to Washington to assure a better return on investment. As an example, Louisville-Washington-Norfolk and Lexington-Washington-Norfolk. This type of routing strengthens the service pattern for all cities involved in the routing.

In the F.A.A. proposal they are recommending that they reduce the certified air carrier slots from 40 to 36 per hour, and also to reduce its operating hours.

I fail to understand their rationale when a certified carrier, on the average, hauled 70 passengers per departure, a commuter carrier only 13 passengers per departure, and general aviation flights generated a whopping 3 people per departure. The certified carriers who move the vast majority of the traveling public, and a large share come from markets under 300 miles, are the ones that are to be hurt the most. It makes no sense at all.

The cities that presently do not fly into Washington National Airport and are over the 650 mile limit want into National Airport as well. I would strongly urge the F.A.A. to encourage them to utilize underutilized Washington Dulles International Airport.

I would also urge the F.A.A. not to put an 18,000,000 passenger cap as the maximum if widebody jets are going to operate at National Airport.

I would urge that bidding for slots not be considered and keep the status quo policy in place.

We in Southeast Virginia and Northeast North Carolina have a community interest in virtually all areas of business, commercial, professional, social and personal. More importantly, Norfolk is the headquarters for the U.S. Atlantic Fleet, Nato Supreme Allied Command Atlantic Operations. Nearby Langley Air Force Base, Fort Eustis, and Fort Monroe utilize Norfolk International Airport. Thus Norfolk can lay claim to one of the strongest needs for good air transportation with Washington vs. any other community in these United States.

STATEMENT OF
LOUISVILLE AND JEFFERSON COUNTY AIR BOARD

ON

FEDERAL AVIATION ADMINISTRATION'S
PROPOSED WASHINGTON NATIONAL AIRPORT POLICY

BEFORE THE
SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
UNITED STATES HOUSE OF REPRESENTATIVES

MARSHALL P. ARNOLD
DIRECTOR OF AIR SERVICE
LOUISVILLE AND JEFFERSON
COUNTY AIR BOARD
LOUISVILLE, KENTUCKY

JUNE 19, 1980

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

I APPRECIATE THIS OPPORTUNITY TO PRESENT THE VIEWS OF THE LOUISVILLE AND JEFFERSON COUNTY AIR BOARD ON THE FEDERAL AVIATION ADMINISTRATION'S PROPOSED POLICY FOR WASHINGTON NATIONAL AIRPORT. THE FOLLOWING STATEMENT HAS ALSO BEEN ENDORSED BY THE LOUISVILLE AREA CHAMBER OF COMMERCE.

THE LOUISVILLE AND JEFFERSON COUNTY AIR BOARD ("LOUISVILLE") IS A BODY POLITIC AND CORPORATE CREATED PURSUANT TO THE KENTUCKY REVISED STATUTES. IT OPERATES AND MAINTAINS STANDIFORD FIELD AND BOWMAN FIELD IN LOUISVILLE, KENTUCKY AND IS RESPONSIBLE FOR PROVIDING AIRPORT AND AIR NAVIGATION FACILITIES AND PROMOTING AND DEVELOPING AVIATION, INCLUDING AIR TRANSPORTATION, AT LOUISVILLE AND JEFFERSON COUNTY, KENTUCKY.

I AM DIRECTOR OF AIR SERVICE FOR THE LOUISVILLE AND JEFFERSON COUNTY AIR BOARD AND HAVE SERVED IN THIS POSITION FOR THE PAST SEVEN YEARS. IN THIS CAPACITY, I HAVE RESPONSIBILITY FOR THE DEVELOPMENT AND IMPLEMENTATION OF AIR SERVICE IMPROVEMENT PROGRAMS AT LOUISVILLE. THIS HAS INCLUDED PARTICIPATION IN NUMEROUS CIVIL AERONAUTICS BOARD REGULATORY PROCEEDINGS, ORAL ARGUMENT BEFORE THE FULL CIVIL AERONAUTICS BOARD, AND TESTIMONY BEFORE THE SUBCOMMITTEES ON AVIATION OF THE U. S. SENATE AND HOUSE OF REPRESENTATIVES. PRIOR TO MY PRESENT POSITION, I WAS WITH AVIATION CONSULTING FIRMS INVOLVED PRIMARILY IN AIRPORT FACILITIES AND ECONOMIC PLANNING. MY FORMAL EDUCATION IS IN MARKETING AND TRANSPORTATION MANAGEMENT, WITH BACHELOR OF SCIENCE AND MASTER OF BUSINESS ADMINISTRATION DEGREES FROM ARIZONA STATE UNIVERSITY.

THE FEDERAL AVIATION ADMINISTRATION IS PROPOSING TO CHANGE THE ALLOCATION OF HOURLY OPERATIONS AT WASHINGTON NATIONAL AIRPORT SO AS

TO REDUCE THE AIR CARRIER CATEGORY ALLOCATION FROM 40 TO 35. IT IS ALSO PROPOSING TO REDUCE THE NUMBER OF HOURS THAT WASHINGTON NATIONAL IS OPEN TO SCHEDULED OPERATIONS. THE COMBINED EFFECT OF THESE TWO ACTIONS WOULD BE TO ELIMINATE 110 OF THE EXISTING 640 AIR CARRIER SLOTS PER DAY, A REDUCTION OF 18.6%. ALSO PROPOSED FOR THE AIRPORT IS AN ANNUAL CEILING OF 18 MILLION PASSENGERS. AT THE SAME TIME, FAA IS PROPOSING TO PERMIT TWO AND THREE ENGINE WIDE-BODY OPERATIONS AT NATIONAL AIRPORT ON A SELECTIVE BASIS. ALTHOUGH NOT SPECIFICALLY STATED, THE PROPOSED RULEMAKING LANGUAGE APPEARS TO IMPLY THAT WIDE-BODY AIRCRAFT OPERATIONS WOULD BE PERMITTED ONLY IF THEY REPLACE MORE THAN ONE NARROW-BODY OPERATION. IF THIS INTERPRETATION IS CORRECT, THEN THE REDUCTION IN AIR CARRIER OPERATING SLOTS WILL, IN FACT, EXCEED THE 110. FINALLY, THE FAA IS PROPOSING TO EXTEND THE 650-MILE NONSTOP PERIMETER RULE WITH THE SEVEN "GRANDFATHER" EXCEPTIONS TO 1,000 MILES.

WASHINGTON, D.C., IS LOUISVILLE'S FOURTH LARGEST MARKET WITH 87,670 O&D PLUS INTERLINE CONNECTING PASSENGERS FOR THE YEAR ENDED SEPTEMBER 30 1979. APPROXIMATELY 82% OF THIS NUMBER WERE LOCAL ORIGIN AND DESTINATION PASSENGERS. ANY OPERATIONAL POLICY CHANGE AT WASHINGTON NATIONAL AIRPORT WHICH MAY SERVE TO DISPLACE SERVICES IN THE LOUISVILLE/WASHINGTON NATIONAL MARKET WILL SEVERELY IMPEDE TRAVEL IN THE LOCAL MARKET AND BE CONTRARY TO PUBLIC INTEREST CONSIDERATIONS. WHILE FULLY COGNIZANT OF AND IN AGREEMENT WITH THE RIGHT OF THE LOCAL AIRPORT PROPRIETOR, IN THIS CASE THE FAA, TO IMPOSE NONDISCRIMINATORY RESTRICTIONS ON OPERATIONS DUE TO LOCAL NOISE CONSIDERATIONS OR GROUND AREA CONGESTION, LOUISVILLE BELIEVES THAT THE AIRPORT PROPRIETOR MUST FULLY CONSIDER THE VIEWS OF AND IMPACT UPON ALL AFFECTED PARTIES PRIOR TO THE IMPLEMENTATION OF ANY RESTRICTIVE POLICIES. IN VIEW OF THE PROBABLE NEGATIVE IMPACT OF AIR CARRIER SLOT REDUCTIONS ON SERVICE IN THE LOUISVILLE-WASHINGTON AND OTHER SIMILAR

MARKETS—PARTICULARLY IN COMBINATION WITH THE OTHER PROPOSED CHANGES—LOUISVILLE IS OPPOSED TO A REDUCTION IN THE NUMBER OF SLOTS ALLOCATED TO THE AIR CARRIER CATEGORY.

AS SEPARATE PROPOSALS, LOUISVILLE DOES NOT OPPOSE THE REDUCTION IN AIRPORT OPERATING HOURS OR THE IMPOSITION OF AN ANNUAL PASSENGER LIMIT IF THERE ARE LEGITIMATE LOCAL NOISE AND CONGESTION PROBLEMS WHICH OUTWEIGH INTERSTATE COMMERCE CONSIDERATIONS NOR DOES IT OPPOSE THE INTRODUCTION OF WIDE-BODY AIRCRAFT AT NATIONAL AIRPORT. AGAIN, HOWEVER, LOUISVILLE IS VERY MUCH CONCERNED ABOUT THE COMBINED IMPACT OF THESE CHANGES AND THE AIR CARRIER SLOT REDUCTION ON LOUISVILLE AND SIMILARLY SITUATED MARKETS.

THE INTRODUCTION OF WIDE-BODY AIRCRAFT, CARRYING MORE THAN TWICE AS MANY PASSENGERS AS THE AVERAGE NARROW-BODY AIRCRAFT, WILL GREATLY ACCELERATE THE ATTAINMENT OF THE 18,000,000 ANNUAL PASSENGER LIMIT, THUS PRECIPITATING FURTHER REDUCTIONS IN THE AIR CARRIER SLOT ALLOCATION. THIS WILL FURTHER EXACERBATE THE PROBLEMS PRECIPITATED BY AIR CARRIER SLOT REDUCTIONS FOR MARKETS SUCH AS LOUISVILLE-WASHINGTON. IT IS LIKELY THAT WIDE-BODY AIRCRAFT WILL BE UTILIZED IN THE LONGER-HAUL, HIGH-DENSITY MARKETS WITH OTHER MARKETS BEARING THE BRUNT OF SLOT REDUCTIONS, ABSENT A POLICY TO PREVENT SUCH OCCURRENCES. IF LOUISVILLE LOSES ONE NONSTOP ROUNDTRIP IN THE WASHINGTON NATIONAL MARKET, IT HAS LOST APPROXIMATELY ONE THIRD OF ITS NONSTOP SERVICE. ON THE OTHER HAND, IF A HIGH DENSITY MARKET EXPERIENCES A NET LOSS OF ONE ROUNDTRIP, THERE IS ONLY A VERY SMALL PERCENTAGE REDUCTION IN FREQUENCY. ALSO, IF A HIGH DENSITY MARKET LOSES TWO NARROW-BODY FREQUENCIES AND GAINS ONE WIDE-BODY FREQUENCY, THE MARKET WILL STILL HAVE EQUAL OR GREATER CAPACITY THAN BEFORE. FOR THIS REASON, IT IS RECOMMENDED THAT THE NATIONAL AIRPORT POLICY REQUIRE THAT ANY REDUCTION IN AIR CARRIER SLOTS WHICH

RESULT FROM THE INTRODUCTION OF WIDE-BODY AIRCRAFT OCCUR IN THE MARKET IN WHICH THE WIDE-BODY SERVICE IS BEING IMPLEMENTED, PROVIDED THAT THE MARKET'S SERVICE IS NOT REDUCED BELOW FOUR NONSTOP ROUNDTRIPS. IF REDUCTION BELOW THAT LEVEL WOULD OCCUR, THEN THE CARRIER ADDING WIDE-BODY SERVICE SHOULD MAKE THE NECESSARY REDUCTION IN A MARKET WHERE SERVICE WOULD STILL BE AT OR ABOVE THE FOUR NONSTOP ROUNDTRIP LEVEL.

THE FINAL CHANGE WHICH FAA PROPOSES INVOLVES A POLICY WHICH IS NO WAY IS RELATED TO LOCAL NOISE OR GROUND CONGESTION CONSTRAINTS, I.E., THE PERIMETER RULE CHANGE. THE INITIAL PURPOSE OF THE PERIMETER RULE AS ADOPTED IN 1966 WAS "TO PRESERVE NATIONAL AIRPORT'S 'MEDIUM' AND 'SHORT HAUL' AND LOCAL SERVICE ROLE AND KEEP IT DISTINCT FROM THE 'LONG HAUL' AND INTERNATIONAL ROLE OF DULLES AIRPORT." NOW, CONCURRENT WITH PROPOSALS TO SUBSTANTIALLY LIMIT OPERATIONS AT NATIONAL AIRPORT, THE TOTALLY COUNTER-PRODUCTIVE ACT OF EXTENDING THE NON-STOP RANGE FROM NATIONAL AIRPORT IS PROPOSED.

LOUISVILLE, LIKE OTHER CITIES WITHIN THE 650 MILE RANGE OF WASHINGTON, D.C., IS CURRENTLY A "COMMUTER" MARKET—A ROUND TRIP MAY BE MADE IN THE LOUISVILLE/WASHINGTON, D.C., MARKET IN A SINGLE DAY WITH A FULL WORKING DAY BEING ACCOMMODATED. PRACTICALLY SPEAKING, CITIES BEYOND 500 OR 600 MILES (LOUISVILLE-WASHINGTON, D.C., IS 467 MILES) ARE NOT WITHIN COMMUTING DISTANCE OF WASHINGTON, D.C., AND THE TRIP OF A LOCAL PASSENGER IN THOSE MARKETS ALREADY INVOLVES AN OVERNIGHT STAY. THEREFORE, EXTENDING THE RULE TO 1,000 MILES WOULD PROVIDE NO MEANINGFUL NEW BENEFIT TO PASSENGERS TRAVELING IN THOSE AFFECTED MARKETS IN TERMS OF TOTAL TRIP TIME. IN MOST INSTANCES, WHETHER THOSE PASSENGERS GO INTO NATIONAL AIRPORT, DULLES AIRPORT OR BALTIMORE-WASHINGTON INTERNATIONAL AIRPORT THE TOTAL ROUND TRIP TIME WILL REMAIN UNCHANGED. ON THE OTHER HAND, IF EXTENDING THE PERIMETER (IN COMBINATION WITH A MORE RESTRICTIVE OPERATIONAL POLICY) FORCES SERVICES IN WASHINGTON MARKETS SUCH AS LOUISVILLE TO MOVE TO DULLES

OR BWI, THEN THERE WILL BE A NET NEGATIVE IMPACT. IN THE CASE OF LOUISVILLE, FOR PASSENGERS TRAVELING TO THE DOWNTOWN OR CAPITOL HILL AREAS OF WASHINGTON, D.C., TRAVEL TIME IN BOTH DIRECTIONS WILL BE VERY NEARLY DOUBLED. THE MORE SERIOUS CONSEQUENCE OF THIS IS THAT LOUISVILLE/ WASHINGTON WOULD NO LONGER BE A ONE-DAY "COMMUTER" MARKET AND THERE WILL BE A SUBSTANTIAL INCREASE IN THE REAL COST OF TRAVEL IN THE MARKET.

FOR EXAMPLE, IF LOUISVILLE LOSES ONE NONSTOP ROUNDTRIP IN THE WASHINGTON NATIONAL MARKET, THEN IT CAN BE CONSERVATIVELY ESTIMATED THAT AN ADDITIONAL TEN TO FIFTEEN PERCENT OF THE MARKET'S D&D TRAFFIC WILL BE REQUIRED TO OVERNIGHT AT THE DESTINATION CITY. AT AN AVERAGE COST OF \$100 FOR EXPENSES ASSOCIATED WITH THE EXTENDED TRIP, THE ADDED OUT-OF-POCKET COST TO TRAVELERS IN THIS MARKET ALONE WILL BE SOME \$719,000 TO OVER \$1 MILLION ANNUALLY. AND, THERE ARE MANY MARKETS WHICH WILL BE SO IMPACTED. IN SHORT, EXTENSION OF THE NONSTOP PERIMETER, WHILE CONSISTENT WITH THE PUBLIC CONVENIENCE IN NEWLY ADDED NONSTOP MARKETS, WILL BE TOTALLY CONTRARY TO THE PUBLIC CONVENIENCE AND NECESSITY IN WASHINGTON'S COMMUTER MARKETS SUCH AS LOUISVILLE.

IN SUMMARY, LOUISVILLE RECOGNIZES AND RESPECTS THE FAA'S RIGHT AS AN AIRPORT PROPRIETOR TO PROPOSE OPERATIONAL RESTRICTIONS ON NATIONAL AIRPORT THAT ARE RESPONSIVE TO LEGITIMATE LOCAL PROBLEMS. WHILE LOUISVILLE DOES NOT OPPOSE THE REDUCTION IN HOURS OF OPERATION, THE ANNUAL PASSENGER LIMIT OR THE INTRODUCTION OF WIDE BODY AIRCRAFT, IT DOES OPPOSE THE REDUCTION IN AIR CARRIER SLOTS, PARTICULARLY IN COMBINATION WITH THE THREE AFOREMENTIONED CHANGES. FURTHER, LOUISVILLE ADAMANTLY OPPOSES THE EXTENSION OF THE 680-MILE NONSTOP PERIMETER TO 1,000 MILES SINCE SUCH A CHANGE WOULD PROVIDE NO RELIEF TO LOCAL NOISE OR CONGESTION PROBLEMS, WOULD NOT MATERIALLY BENEFIT TRAVELERS IN WASHINGTON MARKETS ACCOMMODATED BY THIS EXTENSION AND WOULD BE DETRIMENTAL TO ALL BUT THE

VERY LARGEST MARKETS WITHIN THE EXISTING 650-MILE PERIMETER. IN FACT, THE APPROACH MOST CONSISTENT WITH THE ATTAINMENT OF GOALS CITED BY FAA IN THE PROPOSED RULEMAKING WOULD BE TO NOT ONLY RETAIN THE EXISTING PERIMETER RULE BUT TO ALSO ELIMINATE EXISTING EXCEPTIONS TO THAT RULE. SUCH ACTION WOULD NOT ONLY PRESERVE, IT WOULD ALSO ENHANCE NATIONAL AIRPORT'S ROLE AS A "...MEDIUM' AND 'SHORT HAUL' AND LOCAL SERVICE ..." AIRPORT.

IN CONCLUDING, LOUISVILLE BELIEVES THAT ONE GENERAL OBSERVATION IS PERTINENT AND APPROPRIATE TO THIS DIALOGUE. SINCE THE PASSAGE OF AIRLINE DEREGULATION, MID-SIZE CITIES SUCH AS AND INCLUDING LOUISVILLE HAVE EXPERIENCED SHARP SERVICE REDUCTIONS DESPITE RECORD PASSENGER TRAFFIC LEVELS. DURING THIS SAME PERIOD, THIS SUBCOMMITTEE, THE CIVIL AERONAUTICS BOARD AND THE FAA HAVE BECOME INVOLVED IN THE AIRPORT CAPACITY ALLOCATION PROBLEMS OF INCREASINGLY CONGESTED MAJOR HUBS AND ARE SEEKING SOLUTIONS WHICH ARE EQUITABLE TO ALL AFFECTED PARTIES. AS IS APPARENT IN THE COMMENTS OF NUMEROUS PARTIES, BOTH AIRLINE AND CIVIC, EQUITABLE SOLUTIONS ARE POSSIBLE ONLY WITH THE IMPOSITION OF SPECIAL PURPOSE RULES OR REGULATIONS OR WITH SPECIAL EXCEPTIONS TO MORE GENERAL POLICIES. TO PROVIDE EQUITY, IT IS BECOMING INCREASINGLY APPARENT THAT ECONOMIC REGULATION OF AIR TRANSPORTATION CANNOT BE CAST BY THE WAYSIDE AND THAT ONE FORM OF REGULATION WITH AIRLINES AS THE FOCAL POINT IS BEING REPLACED BY ANOTHER FORM WITH AIRPORTS AS THE FOCAL POINT. LOUISVILLE RESPECTFULLY SUGGESTS THAT THESE CONGRESSIONAL AND ADMINISTRATIVE EFFORTS ARE BEING DIRECTED TOWARDS ALLEVIATION OF THE SYMPTOMS AND NOT THE DISEASE WHICH IS TOTAL AIRLINE DEREGULATION.

WHILE DEREGULATION HAS FOSTERED MANY POSITIVE DEVELOPMENTS, IT HAS ALSO CAUSED SOME VERY SERIOUS PROBLEMS. WE EARNESTLY URGE THIS

SUBCOMMITTEE TO HOLD HEARINGS, AT AN EARLY DATE, FOR THE PURPOSE OF FULLY ASSESSING THE IMPACT OF DEREGULATION AND IDENTIFYING MEANS BY WHICH DEFICIENCIES MAY BE CORRECTED WHILE PRESERVING THE POSITIVE ASPECTS OF THE AIRLINE DEREGULATION ACT.

AGAIN, MR. CHAIRMAN, THANK YOU FOR THIS OPPORTUNITY TO EXPRESS LOUISVILLE'S VIEWS ON THIS IMPORTANT SUBJECT.

RESPECTFULLY SUBMITTED,

MARSHALL P. ARNOLD
DIRECTOR OF AIR SERVICE
LOUISVILLE AND JEFFERSON
COUNTY AIR BOARD

JUNE 19, 1980

Mr. ANDERSON. Please proceed.

TESTIMONY OF A PANEL: FRANK J. WARD, ASSISTANT DIRECTOR, DEPARTMENT OF AVIATION, HOUSTON, TEX.; RAYMOND GLUMACK, EXECUTIVE DIRECTOR, METROPOLITAN AIRPORTS COMMISSION, MINNEAPOLIS, MINN.; PETER DAIKOS, ASSISTANT EXECUTIVE DIRECTOR, NORFOLK PORT AND INDUSTRIAL AUTHORITY, NORFOLK, VA.; AND MARSHALL ARNOLD, DIRECTOR OF AIR SERVICE, LOUISVILLE AND JEFFERSON COUNTY AIR BOARD, LOUISVILLE, KY.

Mr. WARD. Mr. Chairman, and members of the Aviation Subcommittee, I am Frank J. Ward, assistant director of the city of Houston's Department of Aviation. Houston appreciates the opportunity to discuss an issue which it has been concerned about for many years and which is of critical importance to the quality of air service of numerous cities to the Nation's Capital.

The issue to which I am referring and on which I will focus my discussion is the FAA's perimeter rule prohibiting nonstop operations between National Airport and cities located beyond the mileage zone.

Houston opposes any perimeter rule. Such a rule is totally irrational and arbitrary, and cannot be justified by any sound and reasoned regulatory, environmental, or public policy grounds. The only stated purpose in the rulemaking for the perimeter rule is to maintain National's role as a short and medium-haul airport. That rationale is utter nonsense.

National Airport today serves the same long-haul cities that Dulles serves, and in many cases, with more service. In the Houston market, for example, there are twice as many services from National Airport than from Dulles Airport, for the most part, through the delay-ridden, congested Atlanta Airport.

Daily service is provided at National to such short-haul cities as Los Angeles, San Francisco, Seattle, Portland, and Las Vegas, to name a few. National is not and never will be a short-haul airport. The perimeter rule provides no public benefits. It does not reduce

noise or pollution. In fact, it works to the detriment of the public and of energy conservation. It encourages the proliferation of multistop services in markets that can support nonstop service. It encourages inefficient aircraft operations. It encourages waste of fuel by requiring more landings and takeoffs. Much more, it discriminates unfairly against cities located beyond the perimeter. It violates Federal law as set forth in the Airline Deregulation Act of 1978, which requires the CAB and the FAA to rely to the maximum extent possible on the disciplines of the competitive marketplace and not on the heavy hand of Federal regulation.

Keep the total number of flights from National at their present level, but let the carriers determine which cities to serve. Incidentally, Mr. Aaronson in his testimony today recognized this discrimination for cities beyond the 650-mile perimeter, but within the 1,000-mile perimeter. I contend that by extending the perimeter to 1,000 miles, you only compound the discrimination being proposed for those cities beyond that 1,000 miles.

The only effective means to curtail noise will be obtained by direct constraints, such as curfews and passenger and volume restrictions, and by the actual operating limitations of the aircraft itself and of the airport. Subject to the direct constraints on frequencies and curfews, rather than telling airlines where they can and cannot fly, let the airlines decide on the basis of the demands of the traveling public. No amount of regulation is going to effectively change the character of National Airport into a short-haul facility, and it would be the height of folly to think it would.

As the operator of two major airports—one, incidentally, is 7 miles from the central business district—Houston understands the need to reduce noise and congestion and shares the concerns of the local community representatives. But the perimeter rule, whether it is 650, 1,000 or 1,200 miles, will not reduce noise or pollution. What the perimeter rule does do, in effect, is discriminate against Houston because it happens to be outside the 1,000-mile limit, but does not discriminate against Atlanta or does not discriminate against New Orleans, because both of those are within the 1,000- or 650-mile perimeter.

The residents who live in the area surrounding the airport who have been asking for reductions of airport operations would not be able to discern or even care whether the airplanes flying over their homes are going to Atlanta, which is within the perimeter, or to New Orleans, which is within the proposed 1,000-mile perimeter, or to Houston, which is not. The differences in maximum gross total weight takeoff of an aircraft departing for New Orleans as opposed to Houston, which is not within the perimeter, is absolutely minimal. It depends on the passenger load, the freight load, the fuel load, and many other factors.

As we sit here today, Mr. Chairman, many flights are departing from National Airport to the so-called grandfathered cities far beyond the 650-mile limit, seven cities, in effect. If service is terminated at National Airport or curtailed at National Airport, so be it. But if the airport remains open as the only close-in airport to downtown Washington, D.C., it must be available to all cities on a fair, equal, and nondiscriminatory basis, for the airport belongs not

to any particular State or any State within a magic 650- or 1,000-mile radius, but to every citizen of this Nation.

Briefly, I would like to comment on Mr. Onstad's answers to you this morning from the FAA. I, too, am at a loss to understand the real difference between the FAA's perimeter rule and the John Wayne Airport situation in California. Mr. Onstad claims that the one difference is that National Airport is not separately designated on air carrier certificates, but if it was, a perimeter rule would violate the CAB licensing policy. Well, in fact, the CAB does separately designate each of your Washington airports. In a recently concluded CAB hearing, the Washington-Baltimore-Houston service investigation, the CAB purposely designated each Washington airport separately, because the Board in its wisdom wanted the new dormant authority provisions to be triggered, and thereby enhance competition if service was not operated to each or any of the three airports.

Thank you.

Mr. ANDERSON. Our next witness is Mr. Glumack. We will hold our questions until the four of you have completed your testimony.

Mr. GLUMACK. Mr. Chairman and members of the committee, my name is Ray Glumack. I am executive director of the Minneapolis-St. Paul Metropolitan Airports Commission.

The Metropolitan Airports Commission is an arm of the Minnesota Legislature, and we own and operate an integrated system of airports located within the seven-county area encompassing the Twin Cities of Minneapolis-St. Paul and suburbs. This system of airports is comprised of six reliever airports and one major hub air carrier airport that serves the air transportation needs of the citizens of the upper Midwest tier of States.

Based on operations, this system of airports is the third busiest in the Nation, with 1,161,595 air movements in 1979. As a comparison, the busiest airport system in the Nation is Los Angeles with approximately 1.3 million operations performed within their five-airport system.

The Minneapolis-St. Paul International Airport acts as the collecting point, or hub, for the citizens of all of Minnesota, North and South Dakota, major parts of Montana, Iowa, Nebraska, Wisconsin, upper Michigan, and southern Ontario, and is an international gateway with service to and from the Orient and Europe. In addition, many of the Fortune 500 corporations are located in the Twin Cities area, especially those engaged in the food processing/agribusiness industries and the computer/high-technology field. These many large and important firms have a substantial reliance on our airport system for the conduct of their domestic and international business.

These factors, Mr. Chairman—the size of the area served through this hub, the numbers and importance of industry and commerce located within the trade area, and the remoteness due to long distances—are the prime reasons for the upper Midwest's unusually strong reliance on air commerce to meet its transportation needs.

For the same reasons the upper Midwest must totally rely on air transportation to serve its essential needs for efficient access to the Nation's Capital. As evidence of the heavy demand, three airlines,

Northwest and Republic Airlines, two home-based carriers, and Western Airlines provide the service. Additionally, the utilization of the existing schedules is most impressive.

Transferring the air service to and from Minneapolis-St. Paul to Washington, D.C. from the Washington National Airport to any other facility would, indeed, be a most serious disservice to the upper Midwest. The airplane is a long-haul vehicle, and its efficiencies are best realized in long-range utilization. Long-range operations are the best suited for Washington National Airport for many very good reasons, prime among which is fairness. Those U.S. citizens who live great distances from Washington, D.C. are entitled to equal access to the Nation's Capital as those who live close in. The time, energy, and money savings through the utilization of Washington National Airport in a small way compensates for the disadvantages of residing in States distant from Washington, D.C.

On the other hand, U.S. citizens fortunate enough to reside in close-in States are best suited to use Dulles or Baltimore-Washington Airport, in our opinion.

The ground travel time from these airports to places of business in the Nation's Capital most likely will seldom approach the total elapsed time from those arriving from long distances. If restrictions become absolutely necessary, the FAA should divert short-haul traffic to these facilities.

Minneapolis-St. Paul International Airport, like Washington National Airport, is a close-in airport—and by the way, it existed in 1920 in exactly the same location, which is very close in, and it was there in 1940, and continues to serve as the hub airport up to the present time and beyond the turn of the century. These two facilities share many environmental problems, our airport and Washington National, the most serious of which is aircraft noise. Our experience in the Twin Cities has proven that air commerce and a close-in airport can live in reasonable compatibility with its neighbors without reducing operations at the airport or handicapping the ability of air commerce to serve the vital travel needs of the public.

The Minneapolis-St. Paul Metropolitan Airports Commission, together with the airlines serving the airport, in a spirit of innovative cooperation with the residents of the noise-impacted areas and the FAA, promulgated a noise abatement council called the Metropolitan Aircraft Sound Abatement Council, or MASAC. This totally unique organization, in a rare setting of cooperation between the industry and public, has developed a reputation founded upon accomplishment and has become a model for the rest of the country.

Among the 17 noise abatement procedures which have been developed by MASAC and implemented through the joint efforts of the MAC, the airlines, and the FAA without limiting the operational capability of the airport to meet the essential air transportation needs of the upper Midwest, is a highly effective preferential approach and departure program, utilizing flight tracks over the less densely populated areas.

Field rules have been written to control maintenance runups resulting in a 95-percent decrease in runup complaints. Berms have been constructed along the west boundary of the airport, virtually

eliminating complaints from residents immediately adjacent to the airport.

Northwest Airlines, Republic Airlines, MASAC and MAC have developed new takeoff procedures that get aircraft to high altitudes earlier permitting substantial power reductions over populated areas.

Each segment of the 17-point program has contributed in varying degrees in a very positive way toward aircraft noise attenuation. However, the single most dramatic contribution has been a carefully developed support program encouraging Minneapolis-St. Paul airlines to acquire and operate wide-bodied jets into and out of our air carrier airport. The airline response was excellent. Older, narrow-body aircraft were taken from flight schedules wherever possible and wide bodies were scheduled in their places as soon as possible.

To mention one company, Northwest Airlines over the years acquired a most impressive fleet of wide-body aircraft. The result, as the transition from narrow-body to wide-body aircraft continued, was a most impressive increase in the number of passengers handled in a substantially less number of operations, and, I may add and underline, in much quieter aircraft. In our opinion, it is impossible to overstate both the operational and the environmental benefits resulting from this very positive step.

These are some of the programs that have, in fact, reduced many of the negative impacts of aircraft operations and yet at the same time, have allowed the airport to function to its greatest potential, which is also in the public's best interest.

We believe that the FAA can best serve the Nation and the airport neighbors living in the noise-impacted areas of Washington National Airport by devising programs such as those in effect at Minneapolis and St. Paul.

In this manner the FAA would be offering the airport neighbors true relief without crippling air commerce through serious restrictions and capacity limitations.

Attached to my prepared statement is a Minneapolis-St. Paul Metropolitan Airports Commission resolution supporting the continuation of present nonstop Twin Cities/Washington National air service. As the resolution states, we believe there are answers to Washington National's serious environmental problems, and our airport stands in evidence of this belief. We believe that the answer is not the restriction of operations and capacity restraints.

We further believe Washington National Airport can best serve the Nation by assigning long-haul traffic a priority need, and in the context of this paper, we use the term "long haul" as a domestic yardstick which is sometimes referred to as "medium haul."

Thank you, Mr. Chairman.

Mr. ANDERSON. Mr. Daikos?

Mr. DAIKOS. Mr. Chairman, thank you for this opportunity for letting Norfolk state its position.

I am Peter R. Daikos, deputy for trade development for the Norfolk Port and Industrial Authority, Norfolk, Va. The port authority owns and operates Norfolk International Airport, which serves a population of 1.3 million people in southeast Virginia and northeast North Carolina.

I appreciate the opportunity to appear here today on behalf of the 200,000-plus passengers who travel annually between Norfolk International Airport and Washington National Airport. This figure of 200,000 passengers represents 10 percent of Norfolk International Airport's O and D activity. It is also our second largest market and Washington's 13th largest market.

First of all, we see Washington National Airport as the short- to medium-range airport that serves Washington, D.C. The close proximity of downtown Washington lends itself to that role. Washington Dulles International Airport, some 30 miles from downtown Washington, is the long haul and international airport. That is the role that that airport should continue to play. Baltimore-Washington International Airport—BWI—is located some 30 miles from downtown Washington. This airport serves Baltimore and the Washington, D.C. suburbs of Maryland, not downtown Washington.

After reviewing notice of FAA's proposed D19950 and notice of proposed rulemaking D19948, much of what I described of Washington National Airport is going to be destroyed by these two policies as it relates to high density markets within 300 miles of Washington National Airport.

We are all aware that the FAA is suggesting that a bid procedure be implemented and all carriers bid for the right for the slots in question. When the bidding of these slots becomes intense, which it will, carriers who operate on the longer haul routes will be the only ones who will be able to pay for those flights.

Let me give you an example. Piedmont operates a 112-passenger Boeing 737 aircraft which it utilizes on the Washington-Norfolk run. The coach fare less 8 percent Federal tax is \$54.63, times 112 passengers. The revenue on board is \$6,118.56. Eastern operates nonstop Washington-Miami service with 727-200 aircraft. To keep this on an apple-for-apple basis, let us say they have 112 passengers. The coach fare from Washington to Miami is \$145.37. The revenue is \$16,281.44, almost three times as much as what Piedmont or USAir can generate per departure Washington to Norfolk. For prime time slots, it is obvious that Eastern to Miami will be able to afford to pay the premium fee that a bidding process is going to create.

Carriers who have larger aircraft and serve routes in the medium to long range are going to benefit. Carriers such as USAir and Piedmont who have aircraft that have passenger capacities of a little over 100 and who serve the short-haul routes will be hurt, as well as 9 of the top 30 cities in terms of O and D ranking for Washington, all within 300 miles of National Airport. They are Pittsburgh, 9th largest; Raleigh, 12th largest; Norfolk, 13th; Buffalo, 19th; Philadelphia, 21st; Rochester, New York, 22d; Syracuse, 24th; Roanoke, 29th; and Richmond, 30th—over a million passengers. This does not take into consideration the passenger who utilizes Washington as a connecting hub. The 1 million includes local passengers only.

As an example, two of the four USAir Norfolk-Washington flights continue on to Detroit, giving Norfolk-Detroit one-stop service which is a major market to our area due to a very large Ford light truck assembly plant in Norfolk. I doubt very much if we

would have this type of service if it were not for the Norfolk-Washington routing.

USAir in Washington is a primary hub for Norfolk. It allows the traveler from southeast Virginia and northeast North Carolina to connect to other USAir destinations, such as Albany, Buffalo, Cincinnati, Columbus, Hartford, Islip, Long Island, Pittsburgh, Providence, Rochester, and Syracuse, N.Y.

Piedmont tags Norfolk on several of its key markets to Washington to assure a better return on investment. As an example, Louisville-Washington-Norfolk and Lexington-Washington-Norfolk. This type of routing strengthens the service pattern for all cities involved in the routing.

In the FAA proposal, they are recommending that they reduce the certified air carrier slots from 40 to 36 per hour, and also to reduce its operating hours.

I fail to understand their rationale when a certified carrier, on the average, hauled 70 passengers per departure, a commuter carrier only 13 passengers per departure, and general aviation flights generated a whopping three people per departure. The certified carriers who move the vast majority of the traveling public and a large share come from markets under 300 miles, are the ones who are going to be most hurt. It makes no sense at all.

The cities that presently do not fly into Washington National Airport and are over the 650-mile limit want into National Airport as well. I would strongly urge the FAA to encourage them to utilize underutilized Washington Dulles International Airport.

I would also urge the FAA not to put an 18 million passenger cap as the maximum if wide-bodied jets are going to operate at Washington National Airport.

I would urge that the bidding for slots not be considered and keep the status quo policy in place.

We in southeast Virginia and northeast North Carolina have a community interest in virtually all areas of business, commercial, professional, social and personal. More importantly, Norfolk is the headquarters for the U.S. Atlantic fleet, NATO Supreme Allied Command Atlantic Operation. Nearby Langley Air Force Base, Fort Eustis, and Fort Monroe utilize Norfolk International Airport. Thus Norfolk can lay claim to one of the strongest needs for good air transportation with Washington versus any other community in these United States.

Thank you, Mr. Chairman.

Mr. ANDERSON. Mr. Arnold?

Mr. ARNOLD. Mr. Chairman and members of the subcommittee, I appreciate this opportunity to present the views of the Louisville and Jefferson County Air Board on the FAA's proposed policies.

I might add that I am also speaking on behalf of the Louisville Area Chamber of Commerce.

I am director of air service for the Louisville and Jefferson County Air Board, which owns and operates Standiford Field and Bowman Field in Louisville, Ky.

Washington, D.C., is Louisville's fourth largest market, with some 88,000 O and D plus interline connecting passengers for the year ended September 30, 1979. Approximately 82 percent of this number were local origin and destination passengers.

Any operational policy change at Washington National Airport which may serve to displace services in the Louisville-Washington National market will severely impede travel in the local market and be contrary to public interest considerations. While fully cognizant of and in agreement with the right of the local airport proprietor, in this case the FAA, to impose nondiscriminatory restrictions on operations due to local noise considerations or ground area congestion, Louisville believes that the airport proprietor must fully consider the views of and impact upon all affected parties prior to the implementation of any restrictive policies. In view of the probable negative impact of air carrier slot reductions on service in the Louisville-Washington and other similar markets, particularly in combination with the other proposed changes, Louisville is opposed to a reduction in the number of slots allocated to the air carrier category.

As separate proposals, Louisville does not oppose the reduction in airport operating hours or the imposition of an annual passenger limit if there are legitimate local noise and congestion problems which outweigh interstate commerce considerations, nor do we oppose the introduction of wide-bodied aircraft at National Airport.

Again, however, we do have some comments with regard to the introduction of wide-bodied aircraft. The introduction of these aircraft, carrying more than twice as many passengers as the average narrow-bodied aircraft, will greatly accelerate the attainment of the 18 million annual passenger limit, thus precipitating further reductions in the air carrier slot allocation. This will further exacerbate the problems precipitated by air carrier slot reductions for markets such as Louisville-Washington.

It is likely that wide-bodied aircraft will be utilized in the longer haul, high density markets, with other markets bearing the brunt of slot reductions, absent a policy to prevent such occurrences.

If Louisville loses one nonstop round trip in the Washington National market, it has lost approximately one-third of its nonstop service. On the other hand, if a high density market experiences a net loss of one roundtrip, there is only a very small percentage reduction in frequency. Also, if a high density market loses two narrow-bodied frequencies and gains one wide-bodied frequency, the market will still have equal or greater capacity than before.

For this reason, it is recommended that the National Airport policy require that any reduction in air carrier slots which results from the introduction of wide-bodied aircraft occur in the market in which the wide-bodied service is being implemented, provided that the market's service is not reduced below four nonstop roundtrips. If reduction below that level would occur, then the carrier adding wide-bodied service should make the necessary reduction in a market where service would still be at or above the four nonstop roundtrip level.

Louisville, like many other cities within the 650-mile range of Washington, D.C., is currently a commuter market—that is, a roundtrip may be made in the market in a single day with a full working day being accommodated. Practically speaking, cities beyond 500 or 600 miles are not within commuting distance of Washington, and the trip of a local passenger in those markets already involves an overnight stay. Therefore, extending the rule

to 1,000 miles would provide no meaningful new benefit to passengers traveling in those affected markets in terms of total trip time. In most instances, whether those passengers go into National, Dulles, or BWI, the total roundtrip time will remain unchanged. On the other hand, if extending the perimeter, particularly in combination with a more restrictive operational policy, forces services in Washington markets such as Louisville to move to Dulles or BWI, there will be a net negative impact. In the case of Louisville, for passengers traveling to the downtown or Capitol Hill areas of Washington, D.C., travel time in both directions will be very nearly doubled. The more serious consequence of this is that Louisville/Washington would no longer be a commuter market, and there will be a substantial increase in the real cost of travel in the market.

In summary, Louisville recognizes and respects the FAA's right as an airport proprietor to propose operational restrictions on National Airport that are responsive to legitimate local problems. While Louisville does not oppose the reduction in hours of operation, the annual passenger limit, or the introduction of wide-bodied aircraft with the restrictions we suggest, we do oppose the reduction in air carrier slots. Further, we adamantly oppose the extension of the 650-mile nonstop perimeter to 1,000 miles since such a change would provide no relief to local noise or congestion problems, would not materially benefit travelers in Washington markets accommodated by the extension, and would be detrimental to all but the very largest markets within the existing 650-mile perimeter.

I would like to make one concluding comment, and that is that since the passage of deregulation, many mid-size cities such as and including Louisville have experienced sharp service reductions despite record traffic levels. During this same period, this subcommittee, the Civil Aeronautics Board and the FAA have become increasingly involved in the airport capacity allocation problems of congested major hubs and are seeking solutions which are equitable to all affected parties.

As is apparent in the comments of numerous parties, both airline and civic, equitable solutions are possible only with the imposition of special rules or with special exceptions to more general policies. To provide equity, it is becoming increasingly apparent that economic regulation of air transportation cannot be totally cast by the wayside, and that one form of regulation with airlines as the focal point is being replaced by another form with airports as the focal point.

We suggest that in many cases, we are looking at corrections for symptoms of the problem and not addressing the more fundamental problem.

While deregulation has fostered many positive developments, it has caused some very serious problems, and in this respect, we would urge this subcommittee at an early date to hold hearings to fully assess the impact of deregulation and seek means of retaining the positive aspects while correcting some of the deficiencies that have become apparent.

Again, thank you for this opportunity.

Mr. ANDERSON. Thank you very much, Mr. Arnold. My first question is just a general one, to any one of you. Other cities have

abandoned their downtown airports in favor of more modern facilities outside the cities they serve. These and other cities' passengers may have to travel 45 minutes or more from the airport to the downtown area. Why shouldn't the Washington area take the more limited step of restricting operations at the downtown airport? If we improve access to Dulles, what is the big problem in using that airport?

Mr. WARD. We are all going to respond, but Mr. Chairman, I would like to point out that Houston is probably a bad example to respond to your question, in that we do operate two airports, one a very modern, sleek airport that is being constantly improved. We are in the process of constructing \$450 million worth of two terminals. But even with this addition of two terminals, we had to go back a year ago and revitalize and bring back to life our downtown airport. And I think you will find this same thing will be true here.

Dulles is growing, and Dulles will grow. When we built Intercontinental Airport in 1969, they thought we were crazy, that we were out in the woods somewhere. And as you said earlier, and as some of the subcommittee members have said, people moved in. It is a booming economic area. And we are so congested that if we had closed down our downtown facility, as some real estate operators wanted us to do, we would be in one mess right now. We have six certificated air carriers providing us air service all over the country, with the obvious exception of Washington National. And I think you will find the same thing here. You have got an asset out there; do not let it go.

Mr. ANDERSON. Mr. Glumack?

Mr. GLUMACK. Mr. Chairman, Minneapolis-St. Paul is an example of the opposite of the trend that you just mentioned when you read your question. We are, in fact, a downtown airport. We have a downtown airport also in St. Paul that we operate in our system—both very, very successfully. We came to grips in a very realistic way with the noise problem. It is true that we will never be able to get airplanes to fly like butterflies, but we can certainly make them compatible with their environment, and certainly with their urban environments. There are a lot of things that can be done. It is incredible that anybody would even seriously consider destroying a large economic, political and social generator like the Washington National Airport, which is a true asset to this community in so many ways, because of lack of ability to address themselves to the noise problems. The noise problems are solvable, and they are getting better. I believe that by the end of this generation, we are going to see the noise problem well in-hand.

And I think that Dulles Airport is also a needed asset. It has a place to play in the transportation system of Washington, D.C. And to take away capacity, to destroy runway capacity and airspace capacity and the ability to accommodate airplanes is incredible and should not even be thought of.

Mr. ANDERSON. Mr. Daikos, the FAA is considering increasing commuter slots at National. Would this benefit people living in your community?

Mr. DAIKOS. On a long-term basis, Mr. Chairman, we feel that it would not, based on the fact that we rely on incumbent carriers right now, such as Piedmont and USAir to provide flow-through

service through their on-line hubs. As an example, we operate two USAir flights that go on to Detroit, and again, as I indicated in my testimony, I doubt very much if we would have that onestop direct service.

We feel also, with the high density of our O and D, some 200,000 passengers that commuters presently today could not accommodate meeting the market demands.

Mr. ANDERSON. Mr. Ward, in your testimony, you advocate abandoning any perimeter rule for National Airport. Some witnesses last week suggested that if we follow this approach, the less profitable, short-haul markets are going to be dropped by the airlines serving National. It is further suggested that these cities may not get service at Dulles, because fewer passengers would travel if they were required to stay overnight in Washington, as would be required if flights serve Dulles. Do you agree with this analysis, and if so, is your proposal fair to cities which would lose service?

Mr. WARD. I think we are talking about apples and oranges, Mr. Chairman. The commuter carriers are not the carriers that will be providing long-haul service out of Washington National Airport to such short-haul points as Houston. The commuters are going to stay. They have a function out there. I think the carriers that will get hurt—the cities, let us say, that will lose service are those real short-haul markets like Atlanta who, by the very nature of their geographic position, have tremendous passenger loads coming to Washington National Airport, where most of those poor people have boarded in Houston or New Orleans or some other point, where they have to go through that congestion down there—and I know they are building new terminals. But those are the areas that may lose service to Washington National.

What we are asking for is that if a carrier has 10 slots, XYZ Airline, let that carrier operate those 10 slots with 727 or any other narrow-body 3-engine equipment or 2-engine equipment they want to, but let it be a marketing decision by the carrier. If they want to operate them all from Atlanta, great. Then it is my job to sell Delta or Eastern or whoever to give us one of those nonstop services.

The final point is that the Deregulation Act of 1978 honed in on the marketplace and letting the marketplace determine. If a city loses service, it is because the carrier cannot make a profit by operating the service without the backup support of cities like mine. And we do not want to back up Atlanta or any other city. We can provide aircraft, filled, into Washington National. I think that answers your question—at least, I hope it does.

Mr. ANDERSON. Mr. Daikos?

Mr. DAIKOS. We had a scenario that almost is the tailored answer to your question. Back in June of 1978, United Airlines used to operate a frequent service between Norfolk and Washington National Airport. There were two other carriers as well, National Airlines, and to a very minor degree during that time frame, Piedmont Airlines.

United withdrew from the marketplace, and shortly thereafter, National withdrew from the marketplace, and there was a tremendous void in schedule. Truly, Piedmont was serving the market, but in a minimal nature.

We attempted to advertise and promote Washington Dulles Airport and particularly BWI, by providing a free limousine certificate to Washington, D.C., encouraging them to use BWI, and that marketing program fell flat on its face.

We also found during that quarter when we measured our O and D, because of the lack of the Washington, D.C. service, that people just were not traveling to Washington, D.C. unless they absolutely had to. In many cases, they were conducting business over the telephone, or they were extending their stays up here at Washington, D.C., and that commuter activity just did not come about.

But once Piedmont increased their service in the marketplace and USAir came onboard with four trips—we have seven round-trips a day—that activity resumed, if not further stimulated in the marketplace.

Mr. WARD. Mr. Chairman, could I make one quick comment? I made a number of comments, but if you will bear with me, we have a case here of the haves and have-nots. I am a have-not.

All the things that apply to Norfolk and Louisville—and these are my colleagues, and I respect them—all the factors that they can put on paper to explain why they need service to Washington National Airport are the same as the ones we would put on paper. It just happens geography is against us at this particular time. But we are saying if an airline cannot make a dollar in flying from Norfolk or wherever, then it is the airline's prerogative to get out of the market. And what we are saying to you is if an airline can make a dollar by flying between Houston and Washington National Airport, it should be that carrier's management prerogative to take one of its slots or two of its slots and operate from our city to here, as opposed to Atlanta or any others—I am avoiding Cincinnati on purpose, Mr. Snyder, with all due respect.

Thank you, sir.

Mr. ANDERSON. Mr. Daikos, you say the proposal to reduce the number of air carrier slots from 40 to 36 makes no sense because certificated carriers carry so many more passengers than commuters or general aviation. The FAA's reason for this proposal is to reduce the noise impact on the citizens around the airport. If the number of air carrier operations are not reduced, how can we reduce the noise?

Mr. DAIKOS. I must concede that there is going to be a noise problem and will continue, probably, to be a noise problem. But in the same vein, I feel that it is vitally important in order to have these air corridors open for travel, commerce, and whatever. This is the Nation's Capital, and it is vital not only for our community, but any community, particularly numbers when they are great that should have access into this metropolitan airport. And the deemed airport, as far as consumer reaction is concerned, is Washington National Airport.

Mr. GLUMACK. Mr. Chairman, may I tackle that from just a slightly different angle?

Mr. ANDERSON. Mr. Glumack.

Mr. GLUMACK. I think this is a very, very important question, and it needs to be answered very carefully. It is very possible to reduce aircraft noise, to attenuate noise very realistically, without reducing operations. There are many things which can be done. If

you can have the receivers and the users of the noise to compromise through conversation and dialog, and arrive at various things that they wish to do, such as we have done in the Twin Cities area, and then have the FAA in this case—in our case, the Commission—implement, carefully implement the procedures. We have take-off noise procedures developed by Northwest Airlines and Republic Airlines that do attenuate noise, and by the very statistics can show you at your airport, their service out here at Washington National, that their take-offs are less annoying to the airport neighbors. That just happens to be one that comes to mind.

Utilization of the wide-bodied jets will in fact reduce and shrink your noise footprint very dramatically. The night-time operating restriction is a good thing, not a bad thing. The airlines can live with it. It does dramatically reduce noise. Run-up areas can be designated and bermed. That reduces noise. Ground noises can be well and easily handled. There are many, many more things. I said we have a 17-point program.

The problem as I see it here in Washington, D.C.—and I looked at your agenda and it becomes obvious—the area is so fragmented with the receivers of the noise that you can hardly get anything done. For example, a preferential approach and departure lane that utilizes the least congested areas would never succeed here because obviously, that is going to adversely affect someone.

Now, democracy only promises to do the greatest good for the greatest number, the majority. But if you have to please everyone, obviously nothing is going to be done, because whoever the area of departure is designated over that district is going to complain and complain and complain, and it is just not going to be implemented. So there are many things that can be done. And to just resign to it and say it cannot be done, and that the only answer is to cripple this wonderful asset, this close-in airport, that is wrong.

Mr. ANDERSON. Do the members of the panel have a position on whether the Federal Government should own and operate the two airports here? What are the advantages of this Federal ownership? Would a local airport authority or a Federal corporation be better?

Mr. GLUMACK. Well, Mr. Chairman, I think in the case of Washington, D.C., I hasten to say that it is the Federal Government's responsibility. It is not the local government's problem, in my opinion.

Mr. WARD. I would like to make a comment on that, Mr. Chairman.

Mr. ANDERSON. Mr. Ward.

Mr. WARD. I am not familiar with your local government structure here, but I would like to note for the record that Houston—the city of Houston, not an airport authority—operates and owns two airports without the use of municipal tax money, not a nickel, and without arbitrary regulatory interference.

Can you imagine, Mr. Chairman, what would happen if the city of Houston attempted to regulate the use of our two airports in the same manner that the FAA is attempting to do so here? I think it is totally out of order.

Mr. SNYDER. Mr. Ward, I just want to observe that apparently, that falls on the side of turning it over to local people. And I want to tell you if that happens, you will not get from Houston into

Washington National by going through Atlanta or anyplace else. There will not be one slot an hour out there.

Mr. WARD. Sir, I am sorry, the first part of it, I did not hear.

Mr. SNYDER. I said, I am assuming from your answer that you think it would be all right to turn it over to local authorities.

Mr. WARD. No, I did not say that. I wanted to make an advertisement.

Mr. SNYDER. I see. I just want to observe to you that it may be a problem getting to Washington National from Houston by going through Atlanta now. But you will not get into Washington National from Houston anyway if you turn it over to local people. There will not be a slot an hour out there.

Mr. WARD. Mr. Snyder, I agree with you totally. I attended some of the local hearings the FAA held, and I escaped with my life because I have a slight New York accent, I think. They did not recognize me as the tall Texan. I agree with you, sir.

Mr. ANDERSON. I would like the comments of the other members of the panel, on two portions of Mr. Ward's testimony, which I will quote.

First:

Access to National Airport should be considered to be a national equity to be available to all cities on a fair, equal, and nondiscriminatory basis. The availability of nonstop service to National should not be limited to only a few cities which, by mere geographic happenstance, are located within an arbitrarily determined perimeter. Rather, all cities in the country should be accorded the same opportunity to compete for the limited number of nonstop slots at National Airport.

I would like to have your comments on that, and then I have another one following that.

Mr. Glumack?

Mr. GLUMACK. Well, Mr. Chairman, that is indeed—a laissez faire philosophy is indeed one of them that is being seriously considered and certainly is an option. But we do not believe, in the case of Washington National, which is indeed a very precious resource, but a very limited resource, because air space in a terminal area such as Washington, D.C. is a resource, just like water or whatever, and how you divide that up determines the success and, in our case, the safety involved in flight. There simply is not enough runway capacity, there is not enough air space capacity to turn this thing wide loose to laissez faire competition. It has to be managed. And I believe that the way it is presently being managed by the FAA is the best that we possibly can do. If we could wave a magic wand and zap into being what we would love to see happen, we would like to see the CAB still shelter the slot committees from the Justice Department, from antitrust implications, and continue to manage the slots. And the opposite of turning it loose should happen, and it should be carefully managed.

Mr. ANDERSON. Mr. Arnold?

Mr. ARNOLD. Mr. Chairman, we do not agree with the position of Houston on that particular question. In theory, it sounds nice, but if you look at what benefits they really get out of it as opposed to the costs that closer in cities would have to pay, they just are hardly equal.

A person coming from 1,400 miles away cannot possibly commute in the Washington market. The only benefit that is going to be realized by cities at this distance is going to be some added conven-

ience, and I will admit that readily, that it would be somewhat more convenient. But their total trip time is going to stay the same, the actual percentage increase in travel time will be nominal. Whereas cities which are closer in, which are able to commute, if they are forced out to other airports, travel time is going to be at least doubled. We are going to be eliminated as commuter markets. You are going to have a real cost of probably \$100 for every O & D passenger that is forced here overnight. In the Louisville market alone, if that happened to 10 percent of our market, that is some \$700,000 a year at current traffic levels.

Mr. ANDERSON. It is hard for me to understand what you are really saying there. I am looking at Mr. Glumack, who is from Minneapolis. They are roughly 900 miles, and they can come in; and Mr. Ward is from Houston, and they cannot, and they are roughly 1,100 miles. I cannot see much difference between 900 miles and 1,100 miles, as the reason why they should come in.

I am somewhat neutral on that, because I come from Los Angeles, and we wonder why we cannot come in. So I sympathize with Mr. Ward's question.

I would like to have you discuss this a little bit.

Mr. ARNOLD. Well, I am simply saying that passengers coming to Washington from 1,000 miles or farther away, in all likelihood, they are going to be forced to overnight in Washington if they are going to accomplish anywhere near a full day's activities in the Capital. So if they can go nonstop into National Airport, that is not going to change just because of the distance that is involved. It may be a bit more convenient. Their trip time from Houston in this case into Washington will be less, but their overall trip time is still going to be approximately the same. Whereas a city 400 or 500 miles away, where passengers can come in in the morning, do a full day's work, and leave, if they, as a result of this policy change, lose the services into National, are forced to go to Dulles or BWI, then that time factor becomes such that they also have to stay overnight. So you are talking about a real net cost to those markets that would lose services to the closein airports, whereas to the other markets—

Mr. ANDERSON. How far is Norfolk from the Capital?

Mr. DAIKOS. It is 147 air miles between Norfolk and Washington.

Mr. WARD. Do I get an opportunity to respond?

Mr. ANDERSON. Yes. Let us hear from Mr. Daikos first.

Mr. DAIKOS. Again, based on Mr. Arnold's comments, I pretty well agree 100 percent with what he said. When you are 147 air miles away, and you are creating a need for seats for 200,000 passengers, the psychological reaction is one of a commuter. You come up here at 9 o'clock, 10 o'clock, in the morning and conduct your business, and you get back on that airplane at 4 o'clock in the afternoon, and you are back in the Tidewater area of Virginia in a matter of 35 minutes. It is a little bit different, shall we say, from going halfway or three-quarters or all the way across the country. It is just a different situation.

Mr. GLUMACK. Mr. Chairman, from the Minneapolis-St. Paul viewpoint, we are indeed fortunate that we are one of the grandfathered cities, and we have got service in here, and unfortunately, Houston does not.

Mr. ANDERSON. Is 1,100 miles about right?

Mr. GLUMACK. We are 900 miles. And there is a difference, and it certainly is not an easy problem, because we are dealing with a limited resource.

Mr. ANDERSON. You have a 1-hour differential in time.

Mr. GLUMACK. Well, the justification in our instance, and there are a number of justifications, but the overriding one is that we are a collecting point. We are indeed a true hub for all of Minnesota, all Wisconsin, North and South Dakota, a major part of Montana, Nebraska, and part of Southern Canada that comes in here to the Nation's Capital to do business. And as a result of it, we have three airlines that have a very heavy schedule into the Washington area. The justification was there. Somebody in their wisdom way back, when the grandfathered cities were being awarded service into National, took that into consideration. And we have that service, and we feel that it is well justified, and that we are using our slots to the greatest benefit of our citizens.

Mr. ANDERSON. Before you answer, Mr. Ward, I want to throw out your other quote, because I think you will want to take them both up at the same time.

The other quote that I have taken from Mr. Ward's testimony says:

The carriers that have large service complexes at major hubs located within the perimeter have the economic incentive to funnel long-haul traffic between National Airport and long-haul cities beyond the zone over those intermediate points. Thus, cities like Atlanta and Chicago and Jacksonville and Memphis have artificially enhanced nonstop service levels substantially supported by long-haul passengers destined to or originating from such points as Houston-Dallas-Fort Worth.

Conversely, long-haul cities like Houston have artificially depressed nonstop service levels.

Did you want to comment on that—and then I will let you come back, Mr. Ward.

Mr. GLUMACK. Well, I really do not feel that I should comment on that question, Mr. Chairman. I cannot give you an answer that would satisfy you, I am sure. I think I will pass that question to one of my colleagues. Maybe someone else would like to handle that one.

Mr. ANDERSON. Well, Mr. Ward, why don't I let you pick them both up.

Mr. WARD. Let me start with question No. 2. When USAir started its service from Louisville to Houston, it was looking not at Louisville-Houston service; it was looking at Houston-Louisville and beyond. It was looking at service from Houston to Pittsburgh, Philadelphia, and other cities, using our behind Louisville passengers to support Louisville service.

The fact that Louisville has lost 20 percent of its air service since deregulation is not the fault of the city of Houston. We happen to be an aggressive market. We have the passengers. Those that do not, it is a competitive world.

Taking question No. 1, taking first Minneapolis-St. Paul, there are many cities—and I am not trying to be facetious—there are many cities in this country that have grandfather rights because they are grandfathered. We are a young, growing and vital city, and we demand equal treatment.

The additional distance of flying out of the 1,000-mile perimeter to Houston is negligible, because if an airplane takes off from New Orleans and flies nonstop to Washington and an airplane takes off from Houston and flies nonstop to Washington, the difference in flying time is probably 15 minutes. So if we had access to Washington National, we could probably commute into Washington National and do our business in 1 day and go home. But we have so much business to do up here—and again, I am not being facetious—that none of us spend a day up here. It takes longer than that. And we can claim title also to being the headquarters for NASA and so on, but we will not do that.

I am not going to belabor this subject, because there is no rationale for someone trying to explain to me that because they are within a 650-mile magic limit that those of us who are out there beyond that who are major cities should not have access to this airport. Why Las Vegas, Los Angeles do not, and why Houston or Dallas—and I never fight Dallas' cause, but I will fight it here—why Dallas does not have access to this airport is beyond me. We are not asking for increased slots. We are asking for a competitive situation. If a carrier wants to fly to Louisville, then let them. If they want to fly to Norfolk and lose their rear end, let them. If they want to fly to Houston and make a buck, we are for it.

That is all I have to say, sir. Thank you.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Well, Mr. Ward, if you were blessed, like Mr. Glumack, by being grandfathered, wouldn't you resent those other vultures trying to steal your slots?

Mr. WARD. No, sir. I admire them for it.

Mr. SNYDER. I said if you were grandfathered, as Minneapolis-St. Paul is, being beyond the 650-mile limit, if Houston were grandfathered, wouldn't you resent these people trying to swipe at your slots?

Mr. WARD. No, because our position on paper, sir, is very clear. We have taken an unprejudicial viewpoint against any city in the country. We are not saying extend the perimeter to 1,200 miles to take in Houston. We are saying let the market and let the range of the airplane determine what cities get the service. We do not want to discriminate against anyone. We do not want to say, "Give Houston the service and do not give it to Las Vegas." That would be stupid and unfair on our part.

Mr. SNYDER. Well, you indicated to the chairman, that the majority of your travelers up there have so much business they have to stay overnight anyway.

Mr. WARD. Most of them do. I have not done a survey on it.

Mr. SNYDER. And I must admit that the people in Houston with their oil money are much more affluent than the people of Louisville and are in a position to afford that extra cost, and I am sure they have that much business as you indicated.

So if they are going to be up here anyway for 2 or 3 days, another 20 or 30 minutes out to Dulles is not near as serious an economic impact upon your travelers as it is on Mr. Arnold's poor people down in Louisville, that have a hard time putting together the price of a ticket. [Laughter.]

Mr. SNYDER. That is not funny, because that is true of that little airport.

Mr. WARD. I can speak to you as a city employee who does not make a lot of money, and I come up here on the average of once a month. Most of the rich Texans seem to be living in other parts of the world today. But seriously, it is more than 30 minutes, Mr. Snyder. You sit on the "people-mover" out at Dulles, then you get into the terminal, you get your bags, you wait for the bus to fight the traffic. And I have been in that traffic going out there, and your comments earlier about traffic were totally correct. I have slept in a taxi going out there, which incidentally, costs a lot of money. And what we are saying is why should we be penalized, why should we be inconvenienced? We cannot afford it.

I have been through Cincinnati a number of times coming to Washington National Airport, and I do it on purpose; I take American.

Mr. SNYDER. I hope you come to spend some money at the airports in Kentucky.

Mr. WARD. I spend some money at the snack bar. It is a beautiful airport. And I am sorry it is not in Kentucky, because Kentucky is so much prettier.

Mr. SNYDER. It is in Kentucky.

Mr. WARD. That is what I meant, the other way around. [Laughter.]

Mr. SNYDER. Well, we are going to improve the terminal down in Louisville too, so it will be as pretty as Cincinnati.

Mr. WARD. But I hope you understand our problem, sir. All we are asking for is fair and equal treatment.

Mr. SNYDER. I understand your problem, and I understand mine.

Mr. WARD. Fine. I am trying to understand yours, sir.

Mr. SNYDER. You and I are equally parochial.

Mr. WARD. And provincial. Thank you, sir.

Mr. SNYDER. Mr. Arnold., how much service has Louisville lost since deregulation?

Mr. ARNOLD. We have lost approximately 20 percent of our schedules in the last 12 months, and about one-half of that loss has occurred in the last 6 weeks.

Mr. SNYDER. Mr. Daikos, I was interested in your calculations at the bottom of the first page in regard to the slot-bidding proposal, which really is not the subject of this hearing, but which is of concern to me and I suspect will be to this subcommittee in the days ahead.

Do you have any indication on how much revenue is anticipated to be generated by the slot-bidding proposal?

Mr. DAIKOS. Obviously, the prime time slots—that is, the 7 a.m. to 9 a.m. time frame, and the 4 p.m. to 7 p.m. time frame—are the slots or times that the airlines are most interested in, because that is when the traveling public is flying. Obviously, my people are flying at that time of the day, as well as my good friend from Houston. And I know we will maybe produce \$5,000 or \$6,000 of revenue on that airplane, and Houston will have about \$20,000.

Mr. SNYDER. That is what you say in there, but I have heard the numbers bantered around that it will be somewhere between \$40

and \$90 million to produce by virtue of the slot-bidding system, if they go to it. Have you ever heard those numbers?

Mr. DAIKOS. I have not seen those numbers, but it would not surprise me.

Mr. SNYDER. Now, assuming that Norfolk people still want to come into National from Louisville or any of the shorter hauls and they get the air carriers to bid sufficient on the slots to be able to come into there, what would be the logical conclusion that you would reach as to what would happen to the price of the ticket for your consumers from Norfolk to Washington?

Mr. DAIKOS. Tickets obviously would go up astronomically to where it would get to a point where people would just not pay for the ticket, and they just would not come up here.

Mr. ANDERSON. Thank you very much, Mr. Ward, Mr. Arnold, Mr. Glumack, and Mr. Daikos.

We will recess for about 10 or 15 minutes.

[Short recess.]

Mr. ANDERSON. The meeting of the subcommittee will come to order.

We are very honored today to have a former member of this committee and a distinguished member of the Rules Committee with us today, Mr. Taylor.

Mr. SNYDER. He is still a member of this committee.

Mr. ANDERSON. I know, but he is moving up.

Before proceeding to our next group of witnesses, I would like to place in the record, on behalf of my colleague, Nick Rahall of West Virginia, an editorial from the Huntington, W. Va. Herald Dispatch, June 18, 1980 entitled "Congressmen Aren't Only People Depending on National Airport."

[The editorial referred to follows:]

The Herald-Dispatch

Opinion's

6 Wednesday, June 18, 1980

Congressmen aren't only people depending on National Airport

IF AN editorial in The Washington Post is to be believed, the only people who fly in and out of Washington's National Airport are members of Congress who find it a handy jumping-off spot for quick trips home when they need to mend their political fences.

However, that's not exactly the case.

True, National Airport IS regularly used by traveling lawmakers. But said lawmakers make up only a tiny fraction of the airport's flow of passengers — a group which daily includes many Huntington-area residents en route be-

tween National and our own Tri-State Airport.

The problem is that National — like many big-city airports — is in the heart of a residential area which has grown up around it. Thus, there's continuing strife between, on the one side, those who use the airport and like the convenient access to downtown Washington it provides and, on the other side, those who live around it and are bothered by the noisy jets taking off and landing.

Already, National's runways must close at 10:30 p.m., lest the sleep of the airport's neighbors be disturbed. Now, it's being proposed that this

curfew be moved up an hour, to 9:30 p.m. At the same time, it's also being argued that overall traffic into and out of the airport must be sharply reduced.

As reported in this newspaper last Saturday — the same day The Washington Post was voicing its editorial support for the airport's protesting neighbors — both moves could mean additional air service cutbacks for Huntington and other West Virginia cities, already hard hit by airline deregulation.

Banned from National, passengers from Tri-State and other Mountain State airports would have to fly into distant Dulles International or even Baltimore instead, then make the trip to downtown D.C. — more than 25 miles away — by bus or cab.

Says the Post: "It will be Congress, of course, that decides the future of National Airport. . . . If a majority of its members conclude that their personal convenience outweighs the desires and legitimate interest of the people who live in the Washington area, they should probably go all the way . . . and give that landing strip . . . a new name. How about Congressional Perk Airport?"

We agree. Perhaps National Airport SHOULD be rechristened. But we have a suggested name of our own. How about No West Virginians Welcome Airport?

Mr. ANDERSON. The next group of witnesses is a panel consisting of Arthur J. Fillipino, Marlan Forest Citizens' Association of Alexandria; K. Frank Korf, Bellevue Forest Citizens' Association of Arlington, Va.; Kaye Sloan Burke, McLean Citizens' Association, McLean, Va.; Marilyn Cable, National Airport Operations Advisory Board, Prince Georges County, Md.; Eric Cronquist, Palisades Citizens' Association, Washington, D.C.; and Allen Van Emmerick, Cabin John Civic Association of Cabin John, Md.

We are very happy to have this panel with us.

We do have your prepared statements. They they will be made a matter of the record, and the floor is yours.

[The following were received for the record:]

STATEMENT ON THE DEPARTMENT OF TRANSPORTATION'S PROPOSED POLICY

for

METROPOLITAN WASHINGTON AIRPORTS

by

ARTHUR J. FILIPPINO
7105 MARINE DRIVE
ALEXANDRIA, VIRGINIA 22307

PRESIDENT OF THE MARLAN FOREST CITIZENS ASSOCIATION

IN THE

MOUNT VERNON DISTRICT OF NORTHERN VIRGINIA

before

THE SUBCOMMITTEE ON AVIATION, THE HON. GLENN M. ANDERSON, CHAIRMAN

HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

THURSDAY, JUNE 19, 1980

STATEMENT ON THE DEPARTMENT OF TRANSPORTATION'S
PROPOSED POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

BY THE

MARLAN FOREST CITIZENS ASSOCIATION

THURSDAY, JUNE 19, 1980

These are comments on the notice of proposed policy for metropolitan Washington airports as published by the Federal Aviation Administration in the Federal Register on January 21, 1980, docket no. 19950. The item numbers in parentheses correspond to the numbered main points in the proposed policy.

In recent years, our community has suffered increasingly from the impact of air operations from Washington National Airport. When the wind is from the south, which is nearly 50 percent of the time annually, planes departing National Airport fly south along the Potomac River until they reach our area which is about five miles from the airport. They then begin their turns at very low altitude, an average of 2,300 to 3,000 feet. The noise from the jet aircraft is deafening. It disturbs our sleep and rest. It stops conversation. It often drives us from our gardens, porches, and patios. Inside our homes it interferes with radio and television programs. We close our windows and turn on our air conditioners to counter the din. Pollutants from jet engines drift downward and cover our cars and homes with a thin film. The intrusion of National's operations on our community and many neighboring ones has been progressively severe since 1966 when jets were introduced at the airport, and by a steady expansion of traffic volume.

The worst noisemakers are the commercial two- and three-engine jets, notably the DC-9s, B-727s, and B-737s. In March 1980, the last month for which official figures are available, they accounted for 16,915 arrivals and departures. But General Aviation aircraft (private and corporate) and air taxis contribute to the problem. These two aircraft categories accounted in March 1980 for 7,858 and 4,186 arrivals and departures, respectively. As these aircraft are not restricted by National's curfew hours, their presence is most conspicuous at night. We hear them frequently piercing the quiet of nighttime at 11:30 P.M., 1:00 A.M., or 4:45 A.M. Thus National Airport, operating from the heart of a very densely populated metropolitan area, is a very, very busy airport, the 10th largest in the United States, whose facilities are now used by 15 million passengers per year.

Unfortunately, the Federal Aviation Administration's proposals for the future operations at National Airport, as published on January 21, 1980, promise little surcease from the excessive volume of air traffic, and the attendant noise and air pollution. Nor do they address the

vital question of air safety at this over-congested airport which some aviation experts, at recent FAA hearings, have declared to be extremely thin. Our reaction to these proposals is as follows:

1. We oppose further "managed growth" of operations at National that envisages passenger traffic to rise from the present level of 15 million travelers per year to 18 million per year by 1985 (item 2). We recommend instead that operations be reduced sharply within the next three years by diverting flights to the underused Dulles and Baltimore-Washington airports, especially Dulles. To crowd still more passengers annually into an already over-congested air terminal will obviously require major expenditures for more baggage-handling, parking, and other facilities, monies that could be better spent to improve transportation to the other two metropolitan airports. It is instructive to note that every additional one million passengers per year passing through National translates into nearly 3,000 passengers per day, who will arrive to catch their flights and leave after touch down from other cities. The majority will travel to and from the air terminal by car or taxi, thus compounding the enormous traffic congestion and severe air pollution that already exist.

2. We also oppose extending the present 650-mile perimeter for non-stop operations from National to 1,000 miles to include cities other than the seven presently exempted from this rule (known as the "grandfather" exemption) (item 6). To do so would convert National into many more "long haul" operations that are not only inconsistent with present policies to limit air services, but would surely generate more pressure to expand operations well beyond what FAA is contemplating at this time.

3. We applaud the FAA's proposal to "promote and improve" public transportation to Dulles Airport (item 1). This is a crucial step in reducing the inordinately high level of operations at National, and pressures to increase them. However, the FAA's proposal provides no specifics on how better transportation to Dulles is to be achieved. We would like to suggest a number of measures that appear feasible and not too expensive that can be taken at an early date: (a) the appointment by the Secretary of Transportation of a special representative to coordinate the work of various agencies that would have to be involved in ground transportation plans; (b) inauguration of express bus services from downtown Washington, National Airport and other locations such as the terminus of the relatively new Metro station at Ballston in Arlington County; (c) reserving on Metro cars an open corner for baggage for air travelers; (d) making available porters or luggage carts to assist air travelers in transferring to buses; and (e) printing leaflets for distribution at ticket counters at airports, airline offices, and travel bureaus containing information on available airport bus service, bus schedules and fare rates.

exact locations of pickup and discharge points, and car parking costs. For the long term, we recommend assigning high priority to planning for extending the Metro to Dulles with the Department of Transportation providing financial, technical, and other assistance. A letter to the Washington Star on Tuesday, June 3, 1980 convincingly underscores the economic feasibility of a Metro line to Dulles at the earliest possible date as against building a proposed toll road. The letter is attached to this statement.

4. We understand there are significant problems associated with the planned phase-in of wide-bodied jets at National (item 5). Although reportedly quieter than the present two- and three-engine narrower jets presently in use, we have heard testimony at a previous FAA hearing that the wide-bodied planes are, in fact, not a great deal quieter. We have also heard testimony that they will create new operational problems, particularly a safety hazard that can be alleviated only by the costly extension of runways and the addition of other operational facilities. And we foresee their phase-in as an integral part of the FAA's proposed policy to further increase the passenger volume at National to upwards of 18 million passengers per year by 1985. As we have already indicated, we believe that major expenditures related to increasing the passenger volume at National should be avoided.

5. We welcome the FAA's proposal to reduce somewhat National's present 7:00 A.M. to 10:30 P.M. operating hours to 7:00 A.M. to 9:30 P.M. (item 4). We urge that the new rule, if adopted, be strictly enforced. Other measures to reduce the frequency of flights and intensity of noise will also be welcome.

In summary, we strongly recommend actions that will reduce significantly in the next three years the current level of passenger operations at National Airport. We favor a progressive reduction by upwards of 50 percent. Our community in Virginia and many others in the metropolitan area have borne for too long a disruption in our lives from incessant noise and air pollution. The remedy is at hand: a steady, progressive shift of flights from National to the underused Dulles and Baltimore-Washington airports, especially Dulles which was built nearly 20 years ago for the express purpose of becoming the major aerial gateway to the Washington area. The inconvenience this may create can be largely alleviated by expeditious measures to make the two nearby airports more accessible.

Thank you, Mr. Chairman and members of your Subcommittee, for this opportunity to present our views.

Extend Metrorail to Dulles

Washington Star 6-3-80

The renewal of arguments for limiting air traffic at National Airport and the recent announcement of a planned major new office development at Tysons Corners should give pause to those advocating building a toll road parallel to the Dulles Access Road. Dulles Airport and its access road are underutilized resources which could be put to much more efficient use by the obvious step of extending Metrorail to Dulles.

This would link our two major airports to each other and to Union Station and would remove a major obstacle to increased utilization of Dulles. The present Dulles Access Road could then serve as the needed arterial road to western Fairfax and Loudoun counties without building a new road.

The Metrorail extension using the existing access road right-of-way would connect to the Orange Line now scheduled for completion in 1983. The extension could be designed with intermediate stops at Tysons, Reston and Herndon and would alleviate much of the predicted traffic congestion due to new development in this corridor.

Since the Metrorail extension would be above ground in existing right-of-way, it should not require much more construction time than the proposed toll road. From the standpoint of making the most effi-

cient use of existing facilities and relieving our dependence on the automobile, the Metrorail extension to Dulles seems the most sensible solution.

If, instead, a parallel road were built to Dulles, it would be a long time before the economics of the situation would again favor building the Metrorail extension. Instead of relieving our traffic congestion, it would encourage further use of the automobile and would leave both our airport and our traffic problems with us for another 20 years.

Raymond P. Sullivan
Falls Church, Va.

STATEMENT BY
 E. FRANK RONY
 BELLEVUE FOREST CITIZENS ASSOCIATION
 ARLINGTON, VIRGINIA

BEFORE THE
 HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
 SUBCOMMITTEE ON AVIATION
 ON THE DEPARTMENT OF TRANSPORTATION'S PROPOSED
 POLICY FOR METROPOLITAN WASHINGTON AIRPORTS
 JUNE 19, 1960

Mr. Chairman:

I represent the Bellevue Forest Citizens Association of Arlington, Virginia. Bellevue Forest is a residential area on the wooded heights behind the palisade of the Potomac less than six miles northwest of the Washington National Airport runway and somewhat south of Chain Bridge. It is bordered by the George Washington Memorial Parkway on the east and Military Road on the west. The majority of the homes were built before 1957, long before jet traffic was introduced at National. I have lived there myself since 1956.

In terms of airport policy and operations, we are near the center of the north-bound flyway, well within the boundary of what is delicately known as the "NEF 30 contour." NEF, Noise Exposure Forecast, is an arbitrary formula based on intensity and duration of noise. Though the air traffic in theory is to follow the winding course of the river, in practice it follows a straight line, which locates us directly in the flight path. That gives us the noise, the dirt and the unwanted thrill and peril of watching the heavy jets in their clumsy landing configuration, moving almost nose to tail overhead as they roar in and out of National. Indeed, our NEF 30 is the area which the FAA admits receives the most intense impact of noise generated by National, next to the immediate arrival and departure area of National itself, NEF 40.

If FAA plans prevail, Bellevue Forest will still be within that magic boundary in 1990, with even more air pollution and even more sustained plane noise.

We are not newcomers to this issue. We have many times protested against the introduction of jets into National and were first assured by the FAA that jets could not and would never be used at National. In 1963, during hearings before the Subcommittee on Transportation and Aeronautics of the House Interstate and Foreign Commerce Committee on S. 3128 introduced by Senator Spang (First Congress, second session), FAA Administrator Najeeb Ralsky told the Subcommittee that his predecessor

"refused the jets in there because Washington National is not built, designed or set up for jet traffic. Therefore, the Congress built a new airport, in its wisdom." (p.15)

Indeed, Mr. Ralsky continued

"...for the simple, artificial reason that the jet could not properly be accommodated by the Washington National Airport...., they got an airfall, or windfall of flights in Friendship."

When the FAA brought in jets anyway, we asked Arlington County to protest and Arlington County was not heard. The Council of Governments protested and it was ignored. Some of our members, together with the Virginians for Dulles, sued and these hearings indirectly

are the result of this suit. We hope and pray that we will be heard now.

As we see it, the cardinal shortcoming of the Draft EIS and the Supplemental Draft EIS is that they assume that they should perpetuate the role of National as the principal among the three airports in the Greater Metropolitan Washington area. They continue to assign to this comparatively small and admittedly technically unsuited airport, practically in the heart of the Nation's capital and its most populous area, the task of accommodating two-thirds of all air traffic while permitting the other two much larger and environmentally better suited jet airports to split between them the remaining third.

The reason for doing so, always advanced and never questioned, is the allegation that National is the "more convenient airport" and, therefore, the logical preference of most air travellers to and from this area. However, we find in none of the documents produced by the FAA either under court order or threat of contempt of court order, any analysis, any examination or any figures to support this premise. No census was ever taken to determine which of the three airports most travellers would actually prefer, either under present conditions or with fairly simple modifications of surface transport or of air transport connections. The studies submitted to you ignore the tremendous industrial and residential developments which have taken place over the past decades. Representatives of Fairfax County have mentioned to you the new centers which have sprung up in Tysons Corner and Westgate, as well as other parts of Fairfax County. There is a light industrial and research corridor around Route 708, and a vast residential expansion north and west of Falls Church, south of Alexandria and north of Bethesda, convenient to the Beltway and for all of which Dulles is potentially more convenient. And, of course, the explosive developments northeast of Washington and southwest of Baltimore would find Baltimore-Washington International the natural outlet. None of these considerations are discussed in the DEIS or SDEIS which totally ignore the area growth and development of the last decades.

The Secretary of the Interior in his letter to the Secretary of Transportation on April 28, 1980, commenting on the SDEIS alludes to this failure to give the air traveller a genuine choice:

It is clear to us that the most pervasive influence upon the operations of DCA is the air traveller market place. High demand for the convenience for both the visitor and the various air carriers is frequently cited as a major factor. It is our belief that the majority of air passengers using DCA are responding to the sales and promotional efforts of the airlines. If an equal effort were made to "sell" Dulles and BWI airports, the air traffic pressure would not be as high on DCA. FAA, through its DEIS and SDEIS, fails to acknowledge this highly significant factor.

We therefore suggest that a thorough and unbiased survey be made of the real geographic convenience of the three airports.

I address you as representative of a local group which believes that more than its own local interest is at stake. True, we believe that our residences are part of what makes the Nation's capital beautiful, and neither they nor the Nation's monuments and public buildings should be a victim of an airplane produced noise slum. The FAA is oblivious to this fact, but Secretary Andrus, in his aforementioned letter, puts this point in focus:

As framed in the discussion, the issue appears to pit a local group of residents against national business and political interests. The score-

board approach in summarizing the 1978 public comments (Table II-2) is evidence of this. By so identifying interests, the document misses the significance of the Nation's Capital and the protection and enhancement of its environment.

We agree with Secretary Andrus that the DEIS and the SUPIS are inadequate. For, until Washington, D. C. is recognized in its true perspective and alternatives are developed and fully evaluated which give adequate weight to the special values of our Nation's capital and its environs, no statement of impact is complete. The Lincoln and Jefferson Memorials along with the Mall, the Potomac Valley, and historic Alexandria, all these must be saved from destruction by the vibrations generated by the overflights and the steady rain of dirt raining down from 600 commercial jet operations per day. The FAA sees no detrimental effects upon existing parks and recreation areas, but the Department of Interior, with direct responsibility for such lands, concludes that noise levels above 60 dBA at major national memorials and historic sites, such as the Lincoln and Jefferson Memorials and Arlington National Cemetery, and above 70 dBA at all other parks, recreation areas and historic properties constitute a "use" of these lands not allowable under Section 4(2) of the DOT Act of 1966, as amended. Interior, therefore, concludes that FAA exceeds its authority in increasing overflights over Federal lands. Bellvue Forest is directly adjoining Federal lands along the Potomac and it must urge upon the Congress to see to it that its own laws are observed.

The noise pollution generated by National has been much discussed, but little mention is made of air pollution. The DEIS itself admits on p.129:

With the adoption of the proposed policy by 1990, the total emissions of all pollutants but particulate matter are expected to increase as shown below:

	<u>Tons per year</u>
Carbon Monoxide	1527
Total Hydrocarbons	350
Nitrogen Oxides	2236
Particulate Matter	43

Interestingly enough, the DEIS then continues:

The airport-related pollutant concentration increases at all receptor points from base case conditions. This is due to the introduction of the wide-body aircraft and the resulting increase of surface transportation emissions due to the increased airplanes and deplaned passengers.

Thus it seems that the introduction of wide-body planes would not be the solution to National problems, which FAA advocates, even from the standpoint of pollution. The EPA in its letter of March 14, 1980, clearly states that it is "not in a position to endorse a policy alternative that results in violations of these (Clean Air Act) standards." The violations of the Federal Ambient Air Quality Standards, as the EPA sees them, appear to be a direct result of the increased operations under the FAA proposed policy.

Moreover, the FAA, in reviewing the environmental impact and outlining its airport policy for the future, overlooked one major item which is part of both, the individual human body. FAA did not even attempt to measure the impact of continued noise and continued exposure to pollutant upon the child, the adolescent, the grownup, the

sick and the aged. There is not a single word of the effect upon the health of the humans who live now or in the future near the Potomac River, the corridor shaken by the noise and buried by the filth. A previous speaker, interestingly enough, mentioned that the human ear under continuous exposure to noise loses ability to hear the finer tones of music or ultimately even less pleasant sounds. How much more will the health and well-being of present and future generations be so damaged by the continuous overflights? Expert medical testimony on the effect of overflights on human health must be adduced, included in the FEIS, and policy altered to minimize it.

In the course of these hearings, members of this Committee have repeatedly asked about ways to improve the surface transportation to Dulles and BWI. The solutions for BWI were aptly pointed out by Mr. Carl R. Sadler of Maryland. Permit me to outline a few improvements which would greatly aid access to Dulles.

The FAA Master Plan for Dulles submitted by the FAA in 1977 made no provisions for mass transit except to sketch in a "future rapid transit station" in its terminal area plan 1985, which was still a "future rapid transit station" in the "final terminal area 1995," projected for ten years later. There was no elaboration and there were no details. Emphasis always has been on taxi and private passenger car transport which strongly favors National. Thus the Dulles portion of the Master Plan sketched in ever increasing parking lots and the DEIS blithely concluded "The roadway network in the immediate vicinity of Dulles is assumed to remain constant through the year 1990 without the addition of new roads." (DEIS p. 111) The Master Plan suggestion is mentioned but not adopted (supra p. 113).

However, in 1978, the Council of Governments published a "Dulles International Airport Access Study" which outlines access improvements in two stages:

- 1) An immediate action program which would include: 1) traffic priority for Dulles busses at 16th and K Streets, with loading area at the Capital Hilton for Dulles, National and BWI; 2) regular bus stops at Rosslyn Metro Station for National and Dulles busses; and 3) stops for Dulles busses at other Metro stations. Such service could be introduced immediately with small expense.
- 2) A long range program, capable of satisfying the 1985 travel demand, to include more frequent bus service from Washington to Dulles. A Metrorail feeder system, more convenient service for Northern Virginia patrons, development of a shuttle bus service to Dulles from West Falls Church Metrorail station, and development of a remote airport parking lot in the vicinity of the interchange between Dulles Airport access road and I-495.

These suggestions appear reasonable, inexpensive and important in any evaluation of National Airport's future, but are omitted from FAA's "impact statements."

Ultimately, a rail link should be planned to connect West Falls Church and Tysons Corner with Dulles, but the expense of such rail link has never been reliably estimated. Two years ago, the FAA mentioned a possible cost of 110 million dollars; and last week I several times heard a figure of one billion dollars. A study should be made of the feasibility of such link, of its expense and also of the revenues which such link could generate.

If Dulles would be integrated in such an overall transportation net, Union Station, now an under-used "white elephant", could be a solution for the baggage handling and check-in problems of air passengers of the Metropolitan area. A central terminal for all three airports, National, Dulles and BWI, it could receive and deliver all airport baggage and validate all tickets. Passengers arriving by rail, bus or auto could immediately check in, and transfer to the airport-bound busses or, when available, the Metro system.

This could tie in with current discussions about the construction of a heliport to connect downtown Washington with Dulles and BWI. Indeed, this would offer a solution for people with pressing time problems and sufficient funds, for helicopter service from Union Station would bring Dulles and BWI both within easy reach of a busy traveller.

The films shown by the Airline Pilots Association of the effects of wing tip vortex on air space graphically project the potentially disastrous impact on obsolete, crowded airports like National. A reduction of flights at National by the one-for-two use of wide-bodied air planes portends disaster to us under the flight path. The use of a "scatter pattern" to alleviate the concentration of noise and dirt might help some areas, but leaves others still under stress. Final relief, we believe, can only come from a reduction of flights in and out of National. We therefore recommend:

1. The Proposed Policy's reduction in air carrier slots at National from the current 40 to 36 should be considered only a first step, to be followed annually by further slot reductions, to reduce all operations from a current 40 per hour to 20 by 1985. In so doing all flights should be included in the count, particularly the "extra sections" on scheduled shuttle service.
2. The Proposed Policy's plan for reduction of air carrier scheduling and operation during evening and night time must be immediately adopted, and noise abatement procedures on landings and take-offs at National be made emphatically mandatory and enforced by FAA.
3. Commuter carrier operations should be increased from eight to twelve per hour and general aviation operations be continued at 12 operations per hour. Both commuter carrier and general aviation operations should conform to the general scheduling of operations during evening and night time hours.
4. A Regional Citizens Advisory Board must be established to provide input to FAA on aviation policy questions in the Metropolitan area, and, as a matter of highest priority, assist in transfer of Dulles, National and BWI to local control.
5. The Department of Transportation and Metro must take action immediately to provide frequent and reliable bus service, with provision for Metrorail-Metrobus interface, connecting Dulles with the District of Columbia and with National and, on a longer term basis, make arrangements to connect Dulles by rail with Metrorail.

We thereby generally align ourselves with the recommendations of the Metropolitan Council of Governments and the Metropolitan Washington Coalition on Airport problems.

This Committee also asked comments on the desirability of maintaining the Metropolitan Washington Airports as Federally owned and operated entities. As stated above, we believe that FAA ownership and operation of Washington National and Dulles International Airports is highly undesirable, involving that agency in a constant conflict of interest. By law, the FAA must promote the interests of aviation, and the air carrier industry views intensive and expanded use of National at the expense of Dulles and BWI as highly desirable. The exemption from local taxes at National, the assumed convenience of that airport, and established habit patterns lead to that view. At the same time, FAA's statutory duty requires it to serve the interests of the general public and, in this instance, that of thousands of residents of the Metropolitan Washington area who demand reduced use of National. In its role as owner, it acts in the interest of aviation industry of which it is part; and in its role as guardian of the local public

interest it considers only under court order, the concerns of those living in the shadow of planes overhead. The Secretary of the Interior pointed out this constant conflict in his comments cited earlier, stating that the FAA plans for National Airport run counter to the documented recommendations and positions of both the National Capital Planning Commission and the Washington, D. C. Council of Governments. Unlike its rules for other locally controlled airports, Secretary Andrus notes, "While we understand that the FAA may exempt DCA and Dulles International Airport because they are not subject to the grant procedures authorized by the Act, we would expect the FAA to comply with its own regulation."

The conflicts created by the FAA's unique dual role here was frankly admitted by FAA Administrator John E. Shaffer in testimony before Congress ten years ago on June 12, 1970. He pointed out the difficulty of fairly negotiating contracts with the same industry that the FAA has to regulate, and the inconsistency of such role with the concept of federalism in which local government has a voice in public matters affecting their immediate interests.

We, therefore, align ourselves with previously made proposals that the States of Virginia and Maryland and the District of Columbia should be authorized to enter into a compact to operate the three major airports within the Washington-Baltimore area--Dulles, BWI and National--returning the FAA to the role of supervisor of locally operated airports, and regulator of the air traffic between them, which it now has as to all other airports save these.

STATEMENT OF
KAYE SLOAN BURKE
PRESIDENT
MCLEAN (VA.) CITIZENS ASSOCIATION
BEFORE THE
THE SUBCOMMITTEE ON AVIATION
OF THE
THE COMMITTEE ON PUBLIC WORKS
OF THE
US HOUSE OF REPRESENTATIVES

June 19, 1980

7207 Churchill Road
McLean, Virginia
22101

Mr. Chairman and Members of the Subcommittee, my name is Kaye Sloan Burke, and I am the president of the McLean (VA.) Citizens Association. I welcome this opportunity to testify on the Department of Transportation's proposed policy for the Metropolitan Washington Airports. I commend the Subcommittee for recognizing local citizen interest and concern regarding the safety and environmental problems resulting from the Washington Metropolitan Airports, primarily National Airport.

Over the years, members of the McLean Citizens Association have become increasingly concerned about the safety and noise problems resulting from the FAA's use of air space over their homes. Because we live adjacent to the Potomac River corridor, we are in the National Airport flight path, which can bring up to 300 jets a day to our neighborhoods. We are unhappy with this burden of noise and watch with dismay the FAA's failure to fully utilize the modern facilities of Dulles Airport. While McLean citizens suffer from noise from National Airport jets, thousands of other area citizens cannot find a flight from Dulles, the airport closest to them, so they must travel to National for service, thus compounding the problem.

The FAA Proposed Policy to reduce noise from National Airport flights by eliminating four slots per hour, allowing 36 jet operations instead of 40, is not a sufficient reduction. The 18 million passenger ceiling is totally inappropriate, allowing for a 30% increase over the 1978 passenger level.

That the FAA has failed to offer citizens any proposal significantly reducing traffic at National is shocking. After gathering comments in their 1978 hearings, in which 62% of the testimony called for a reduction of growth, the FAA produced a statement proposing "restricted", "managed" or "expanded", growth as alternatives. Further, FAA's proposed policy is unacceptable to us

because it does not include a complete evaluation of the problem of noise in the Potomac River corridor.

It is our contention that Dulles Airport, zoned so carefully by the Fairfax County Board of Supervisors for growth, is grossly underserved and that the heavy concentration of jet aircraft at National, set as it is in the middle of a major metropolitan area, creates a safety and environmental hazard which exposes a large number of residents to dehumanizing noise pollution. The FAA has taken the role that Congress intended for Dulles Airport and assigned it to National, making it and not Dulles the major jetport in our area, one of the ten busiest in the United States.

There is a growing need for more jet flights at Dulles, and we believe that all area citizens would benefit from a 50% reduction of commercial jet operations at National. This would mean better service to Dulles and less noise for citizens in McLean.

In the past ten years, Fairfax and Loudoun Counties have experienced tremendous growth. The expanding population and concentration of new industry in these two counties have created a greater demand for jet service at Dulles Airport.

Fairfax County, where part of Dulles Airport is located, is the fastest growing jurisdiction in the Metropolitan area. Population projections estimate an increase of 240,700 people from 1975 to 1985. Our county's population has grown by almost 40 percent just in the last five years.

Loudoun County, where the rest of Dulles is located, continues to experience the same kind of enormous growth. Within a 6-mile radius of Dulles, 10,000 new housing units have already been approved by the Loudoun Planning Commission, and the County forecasts an additional 25-30,000 more units from 1980 to 2000. Within a 6-mile radius of the Dulles Airport entrance are 14,000 acres zoned for industrial

use. The town of Leesburg, is presently developing two new industrial parks.

Travel time to Dulles will be reduced upon completion of Route 66 and the connector from I-66 to the Airport Highway, making Dulles much more accessible to many citizens in the metropolitan area. The new highway system will be far better able to handle air passenger traffic than the busy commuter highways in and around National Airport.

In summary, the McLean Citizens Association makes the following recommendations:

1. That there should be a 50% slot reduction at National Airport by 1985, and that if there is an admission of widebody aircraft, it should be on a 1-for-2 basis only.
2. That a true 650-mile perimeter limit for flights to and from National be observed.
3. That the COG resolution to limit the total annual passenger level to 14 million be adopted.
4. That the FAA's proposed policy for a 9:30 p.m. scheduling curfew, with airport operations ending at 10:30 p.m., be adopted.
5. That better public surface transportation from McLean and Tysons Corner be provided to Dulles Airport.
6. That each plane be counted at National Airport and that extra sections of scheduled shuttle service be included in the total limit of air carrier operations.
7. That a Citizen's Advisory Board be established as recommended by COG, CAP, and the Virginians for Dulles.
8. Finally, it is the position of the McLean Citizen Association that the transfer of ownership of National and Dulles Airports to a local jurisdiction, preferably the Commonwealth of Virginia, is desirable. Transfer, in our view, is inevitable and avoids the conflict of interest now faced by the FAA. The FAA cannot regulate and promote an industry at the same time.

NATIONAL AIRPORT OPERATIONS ADVISORY BOARD OF PRINCE GEORGES COUNTY

SUBMITTED FOR THE RECORD, JUNE 19, 1980

U.S. HOUSE OF REPRESENTATIVES COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,

SUBCOMMITTEE ON AVIATION

Introduction

This statement represents the position of the National Airport Operations Advisory Board of Prince George's County, which was appointed by the Executive, Lawrence Hogan, to offer advice and recommendations concerning National Airport operations.

Statement

One of the factors that should be considered of the utmost importance in the operation of National is safety. National Airport brings over 600 landing and departing airliners into within 2 miles of the geographic center of the Nation's capital. There have been many publicized reports that National Airport is woefully overused. Furthermore, by airport standards, National is antiquated. A heavily utilized airport in the heart of an urbanized area presents the risk of a major air crash.

We do not recommend that National Airport be closed. The airport provides a needed service, and does so conveniently, by nature of its location. However, it is clear that the sheer numbers of flights at National present a safety risk. These concerns will not allow us to endorse FAA's proposed limited decrease of slots at National; we support

a 50% reduction. In addition, we recommend that slots be awarded to commercial carriers on the basis of how quiet their aircraft are, with the greatest number of slots allocated to the carrier with the quietest aircraft, to assist in alleviating the noise burden on the communities affected by the flight path.

If, as the Airline Pilot's Association says, wide-bodied planes are too dangerous to fly in and out of National, we recommend that they not be allowed to use that airport. A thorough study of the operation safety of wide-body jets at National should be conducted by a competent organization which is independent of the FAA and the airlines.

However, if the wide-bodies are safe at National as long as a 10 mile distance between planes is maintained, we would approve the use of wide-bodies so long as the support services at the terminal would be adequate, the wide-bodies were determined to be environmentally acceptable, and that a solid commitment were given to significantly reduce the total number of slots available.

In recommending the reduction of flights at National, we are by no means suggesting that total airline service available to the metropolitan area be curtailed. Airline flights restricted at National could readily be handled at Dulles or BWI. Dulles easily meets modern airport standards and is grossly underutilized. "Dulles was built ... to become Washington's major 'jetport.'" The decision to pour \$120 million -

in 1960 dollars - into it was predicated on the belief that National Airport was too crowded, too noisy and too dangerous.*¹ National now handles almost four times as many passengers as it did then.

Baltimore-Washington International is a well-equipped airport that is not used to anywhere close to capacity. Particularly with its recent expansion and modernization, BWI can be effectively used to supply some of the airplane flights that would not be continued by virtue of a reduction in slots at National. National would still operate flights to and from Washington - offering downtown workers and close-in residents the convenience of this close-in facility. But those who live outside the city would have the opportunity to have meaningful flight schedules out of Dulles and BWI.² Data showing the areas of growth around the Washington metropolitan area indicates that two major growth areas are Tysons Corner and toward Columbia. Therefore, directing more traffic to Dulles and BWI represents good planning for the present and for the future.

In the 1940's, National Airport, in the center of Washington, Midway Airport in the center of Chicago, and Love Airport in the center of Dallas served as "downtown" terminals for the propeller aircraft of those times. The same was true in many large cities across the country. Other cities have relocated their major airport facilities to outlying areas to better accommodate the needs of the jet age. Yet National remains - and is overcrowded, dangerous, noisy, and a groundtraffic nightmare. National has the most heavily used runway in the country.³ It is "essentially a one runway operation and that runway is already saturated.*⁴ National is even more difficult to

approach because of the existence of the restricted zones in Washington, D.C., and because National Airport's flight path is sandwiched in between those of Dulles Airport on the west and Andrews Air Force Base on the east. National is the last major downtown jetport except for San Diego, where tragedy occurred recently.

The travel time to Dulles from downtown Washington compares favorably with other large cities. For example, the travel time from downtown Washington to Dulles (45 minutes) is the same as that from downtown Chicago to O'Hare, except during rush hour, when the Chicago/O'Hare trip takes 15 minutes longer. The Washington/Dulles trip is the same as that from downtown L.A. to the L.A. Airport.⁵

Good transportation service is currently available to downtown Washington from both Dulles and BWI. Nonetheless, mass transportation to and from Dulles and BWI should be improved. The presently operating transit systems should be enhanced by providing frequent bus connections linking the Dulles and BWI Airports with the subway system, by building a subway system to both airports, and by developing a heliport system on the top of Union Station - which could be connected via an underground transportation system directly to the U.S. Capitol building, for the convenience of Congress and others doing business on the Hill.

Of course, the construction of additional subway lines will cost money. But so would a renovation of National Airport's terminal facilities - which would mean "years of construction and turmoil while the terminal was being moved closer to the Metro stop."⁶ In Secretary Goldschmidt's

words, National Airport is a "dump."⁷ Rather than continuing to spend money to expand National's services (the FAA proposal would increase passengers by 20%), the money would be more wisely spent in constructing additional subway lines to Dulles and BWI.

To insure the greater use of Dulles and BWI, we recommend that National Airport be used only as a short haul facility. The 650 perimeter should be enforced for National, and to be equitable, the grandfather cities should not be allowed there. Dulles and BWI can provide longer-haul service.

We support extended curfew hours, which would make National a better neighbor for communities adversely impacted by noise. In addition, we endorse a scatter plan for take-offs and landings (as has just been adopted by COG in Washington at its June 11 Board Meeting, for areas to the south of National Airport), to equitably distribute the noise associated with aircraft. A handful of communities should not have to bear the noise created by one or a handful of turning points. If the airport is to exist for everyone's convenience, then everyone should share its noise and its pollution. In adopting an equitable flight path, noise generated by take-offs and landings must be considered. In addition, communities located under the electronic glide path that must be flown during bad weather and at times of very heavy traffic must be relieved at other times.

Reducing operations at National Airport is totally consistent with Congress' responsibility to protect for the present enjoyment of its citizens, visitors, and for posterity the scenic and historic Potomac River, on which are located Mt. Vernon, the Mason Neck Wildlife

Refuge (home of the American bald eagle), Fort Washington, Piscataway National Park, National Colonial Farm, the C & O Canal, and the Potomac Palisades. On approaches and departures, aircraft overfly at low altitudes 30 miles of the heart of the Potomac and both its Maryland and Virginia shorelines. Congress has appropriated millions of dollars to protect this river and its shores for posterity, and has been joined in these efforts by the Mt. Vernon Ladies Association, the Accokeek Foundation, the Ferguson Foundation, and hundreds of private citizen donations. In addition, precious historic national treasures such as the Lincoln Memorial and the Jefferson Memorial, which Congress is responsible for protecting and which are visited annually by millions, are affected by aircraft pollution. Reducing the current level of noise and air pollution will prolong the life of the monuments, radically improve the enjoyment of the visitor's experience of Washington, D.C., and provide a more humane environment in which its residents can live more meaningful, productive, and pleasant lives.

Finally, FAA, in operating airports, as they do in the instances of National and Dulles, has a dual role, which is contradictory. On the one hand, FAA is responsible for developing the airports; on the other hand, FAA is responsible for safety and the efficiency of airlines. We strongly recommend that FAA be divested of all activities associated with operating, promoting, and developing National and Dulles and that these airports be turned over to a local, multi-government air transit authority representing Maryland, Virginia, and Washington, D.C. Local control is the way that all other airports are operating and they have successfully met the legitimate transportation needs of the traveller while facilitating the community protection of its environment.

We appreciate your serious consideration of these recommendations.

Footnotes

¹"The Washington Post," April 12, 1980.

²CAP Report, January 11, 1980.

³Engineer at National Airport.

⁴"The Washington Post," September 23, 1979.

⁵Airline Travel Guide.

⁶"The Washington Post," April 12, 1980.

⁷"The Washington Post," September 23, 1979.

THE PALISADES CITIZENS ASSOCIATION

Serving the area between the Potomac River, Parkell Road, Loughboro Road and District Line

WASHINGTON, D. C.

STATEMENT BY THE PALISADES CITIZENS ASSOCIATION
ON THE DEPARTMENT OF TRANSPORTATION'S PROPOSED POLICY
FOR THE WASHINGTON NATIONAL AIRPORT

Submitted at the hearing of

The Subcommittee on Aviation of the Committee
on Public Works and Transportation
U.S. House of Representatives

June 19, 1980

(Eric Cronquist)



STATEMENT BY THE PALISADES CITIZENS ASSOCIATION
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June 19, 1980

Mr. Chairman,

There are in our opinion two issues of fundamental importance to the policy for Washington National Airport as proposed by the Department of Transportation. One is the issue of whether the proposed policy will provide a solution to the problem of how to provide a rational transportation policy for the Washington metropolitan area for the next decade. The second issue relates to the scope of the proposed policy in dealing with the acute problem of the environmental impacts of an airport that was not built for the purposes it is actually serving.

With respect to the question of whether the Department of Transportation's proposed policy can be seen and understood as part of an overall policy to induce a rational transportation policy, we would want to state the following. We know as a fact that the capacity of National Airport is more than fully utilized while the capacities of Dulles International and Baltimore-Washington International are far from being utilized. In considering this fact without probing into the reasons, one would be led to believe that the pattern of the metropolitan area with respect to demographic features, location of industry and trade, and similar factors that should affect the structure and mode of transportation, are such that interstate commerce is better

served by National Airport than by the other two facilities in this area. As a consequence, massive investments to improve and update the handling capacity of National Airport would be required since no industry can be efficiently operated through continuous overuse of its capacity. What then are the facts with regard to the localization issue? Is there a rational analysis of the transportation requirements of the area geared to the Department of Transportation's proposed policy? We, unfortunately, find that there is little in the proposed policy dealing with this issue. Would it not be of fundamental importance for a discussion of the continued use of National Airport to undertake such basic research? We in the Palisades Citizens Association, as members of the Coalition on Airport Problems (CAP) believe that there have been large changes in the last decade in the residential and location patterns in the metropolitan area and we advocate that interstate commerce, in the broad sense of the term, would be better served by a 50 per cent cutback in the operations at National and corresponding increases in operations at the other two airports in the area. We advocate a 50 per cent slot reduction at National since we believe that there will be no hardship for those users of National for whom this airport is cost-efficient. There will still be an adequate number of flights from National. The advantage will be that airlines will be able to fill their slots consistent with the demand in the marketplace while developing alternative and supplementary flight schedules from the other two airports, thus providing the entire Washington area with adequate transportation options.

With respect to the second issue, i.e. the environmental impact of the proposed policy, we find that there can be no meaningful noise and

pollution reduction at National Airport with a four-slot-per-hour reduction as proposed, particularly since the proposed policy obscures a more fundamental point. The fact is that the proposed reduction is a purely semantic phenomenon. The Department of Transportation's policy proposal does not seek a reduction, but rather an additional transfer of slots from air carriers to commuter aircraft. Although this is in keeping with a policy of reorienting the use of National Airport to short-haul traffic, this policy stance does not in itself provide any meaningful noise relief e.g., to the citizens in the Potomac corridor. As long as jet carriers are still preventing outdoor conversation, interrupting church services and public meetings, virtually every area jurisdiction and citizens' organizations in the region will continue the legal and moral battle to get rid of this nightmare. Both the pollution and the noise intrusions are difficult to comprehend for those who are not exposed to it. The fact that National Airport is federally owned may have prevented a complete understanding of this problem. The local governments in the area have no direct vote and very little impact on the policies relating to National Airport and this has resulted in a situation where, despite Congressional efforts to create an Aviation Advisory Board, all decisions concerning National Airport remain unfettered by any advice formulated by the residents. The present noise situation is a blemish on the reputation of the Nation's Capital, which it does not deserve.

In summary, the metropolitan area needs a rational transportation policy. Last week's hearings clearly indicated that the airlines are holding Congress hostage since they do not want to provide the balanced service that the area needs. We hope that as a result of these hearings a compre-

hensive, rational and responsible policy will be formulated for National Airport. With respect to the noise issue, the citizens are extremely satisfied that a number of congressmen in last week's hearings found that they would be willing to discount the noise impact on the city. We are happy because the concerned citizens in collaboration with the Council of Governments have proposed that the noise be scattered equitably over the area. We have proposed, and the airlines agree to this particular proposal, that all flights from National be scattered over a broad geographical area, starting at the end of the runway, as a supplementary procedure to the proposed change in the overall policy for National. In order for the District of Columbia to be fully included, we are happy to hear that Congress would be willing to reduce the eastern boundary of the present so-called restricted area so that a wide geographical scatter pattern can be obtained consistent with safety.

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Cabin John Citizens Association

P. O. BOX 31

CABIN JOHN, MARYLAND 20731

STATEMENT BY

ALLEN VAN ENMERIK, PRESIDENT

Before the COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION, SUBCOMMITTEE
ON AVIATION, U.S. HOUSE OF REPRESENTATIVES, June 19, 1980

Mr. Chairman:

The citizens of Cabin John, Maryland, fully support the Metropolitan Washington Council of Governments, the Metropolitan Coalition on Airport Problems, and the numerous other organizations united to return Washington National Airport (WNA) to the proportions of a bearable nuisance.

WNA IS THE CAPITAL'S DOORWAY; WE ARE ITS DOORWAY

Cabin John has long proposed noise reduction measures, for we live directly beneath the ten-mile point at which jet air-craft abandon the so-called noise abatement procedures and apply "increased climb power" (FAA terminology) before turning to their ultimate destinations. Hence, for the past thirteen years, we have received more than our fair share of the noise burden from WNA. This blatant discrimination need not be tolerated any longer. The FAA's discriminatory policy is particularly offensive when we consider that Cabin John is an old, established community founded long before WNA was a reality. Some of its citizens have lived in the area for many years and indeed we have many second and third generation families.

Others have adequately exposed the shabbiness of the technical arguments for more of the same at WNA. I will not repeat them, but instead will speak to the human costs suffered by some so that others may enjoy WNA's convenience.

DOORWAY STATUS IS BY DESIGN, NOT OF NECESSITY

A brief history of the noise problem in our community may be helpful in order to understand the extent of the problem. In 1966, when jets were first introduced into WNA they fanned out soon after departure. However, in 1967, after receiving complaints

from various citizen's groups, the FAA decided to use the so-called river corridor flight path for both north and south departures. In 1975, the FAA finally realized the inequity of its policy and agreed to adjust the flight path for west and south destined flights to a less populated area slightly south of Cabin John. But when our neighbors to the south complained, the FAA quickly sent all the jets back to Cabin John. In 1977, hearings were held by the FAA on its proposal for scattering the jets after take-off from WSA. Of course, when people who were afflicted with little or no jet noise were asked if they wished to share in the noise burden, the answer was an inevitable no. This history should demonstrate the strong feelings that people feel towards aircraft noise. Jet noise is a serious matter and is not to be dismissed lightly. It is therefore not fair to call those who legitimately protest the unbearable noise as "spoiled brats". This is the voice of privilege talking down to everyone imposed upon. Such privilege can be nearly as well served at Dulles and BWI if those airports are well served on the ground.

RATIONAL AIRPORT POLICY WOULD MANUMIT OUR SERVITUDE

Cabin John does not oppose progress, or bearing its fair share of the necessary costs. We favor intelligent, rational progress using all available resources, with the cost borne equally by all those who benefit from the progress. To concentrate growth at one airport in a three-airport city, whose suburbs are swiftly expanding toward the other two, is to say the very least short-sighted. While WSA may be the most convenient for some, this is not true for many who live in the suburbs. Providing two subway lines to WSA but not to provide a single line to Dulles is the very reverse of progress.

Concern for deterioration in the quality of life of people affected by airport development is an essential element in formulating airport policy. Quiet is a primary factor in that quality. We are not talking about mere annoyance, but a real health problem. The dangers from exposure to excessive noise are being increasingly recognized by

the medical profession. In the EPA report entitled "Noise: A Health Problem" (August 1978), it is stated that "Noise is more than a nuisance. It contributes a real and present danger to people's health. Noise has been clearly identified as an important cause of physical and psychological stress, and stress has been directly linked with many of our most common health problems". In answer to the mistaken belief that people learn to live with noise, the report states: "The idea that people get used to noise is a myth. Even when we have become accustomed to noise, biological changes still take place inside us which can lead to diseases of stress".

We deserve the right to the quiet enjoyment of our homes; at least against unnecessary noise. Our right should take precedence over that of those who would press the use of WNA in the name of convenience. We are among the many thousands of people who have to endure excessive noise so that a few thousand people can be served daily with what is narrowly and short-sightedly perceived as convenience.

NATIONAL AIRPORT POLICY WOULD BENEFIT ALL

To repeat, we are denied daily peace. A minimum daily average of 300-500 jets bombard our homes at full power from 7 a.m. to 11 p.m. and often beyond. Nothing better illustrates the callousness of WNA operations than the intentional clustering of flights at the 10 p.m. curfew time which makes violation inevitable. When Cabin John is not being used as a dispersal point for departure jets, it is being used as a rendezvous point for arrival jets. At many times of the day, the sound of one jet has not begun to fade before another follows. It never ceases at those times, and is only slightly intermittent the rest of the time. But what does stop is the peaceful enjoyment of our homes.

Due to our unique situation, perhaps we can better see how much more enjoyable this city would be for all—Congress, dignitaries, government, industry, tourists, local people—if only WNA noise were abated. In addition to urging rationally reduced use of WNA, we urge the adoption of the scatter plan as the only just way to spread the cost for WNA's convenience. Neither Cabin John at the north end of the corridor, nor like

communities at its south end, should have to bear the brunt of aircraft at full thrust. If WNA is to exist, a true scatter plan should be implemented without any further delay. If the majority of residents cannot share the noise, then the logical and just solution would be to close WNA. To expect a minority of people to bear the noise burden for the majority is morally reprehensible.

Cabin John appreciates the opportunity to testify before this Sub-Committee on a matter of common concern. It hopes in turn that the Sub-Committee appreciates the adverse impact on all the people inflicted by current operations at WNA.

Thank you.

Mr. ANDERSON. Please proceed.

TESTIMONY OF A PANEL, INCLUDING: ARTHUR J. FILLIPINO, MARLAN FOREST CITIZENS' ASSOCIATION, ALEXANDRIA, VA.; K. FRANK KORF, BELLEVUE FOREST CITIZENS' ASSOCIATION, ARLINGTON, VA.; KAYE SLOAN BURKE, McLEAN CITIZENS' ASSOCIATION, McLEAN, VA.; MARILYN CABLE, NATIONAL AIRPORT OPERATIONS ADVISORY BOARD, PRINCE GEORGES COUNTY, MD.; ERIC CRONQUIST, PALISADES CITIZENS' ASSOCIATION, WASHINGTON, D.C., AND ALLEN VAN EMMERICK, CABIN JOHN CIVIC ASSOCIATION, CABIN JOHN, MD.

Mr. ANDERSON. Mr. Fillipino?

Mr. FILLIPINO. Thank you, Mr. Chairman.

The civic association I represent is Marlan Forest, which is about 5 miles south of National Airport, and therefore, we are in their turning pattern for southern departures. So you can imagine, with these aircraft making their turns at an average of 2,300 to 3,000 feet, the environmental impact is obvious to everyone in this room.

Contrary to some popular beliefs, National is not an airport with restricted operating hours. They allow the private and corporate sectors to operate 24 hours a day. In the month of March alone, there were in excess of 13,000 arrivals and departures. So we are not spared at a specific hour. Although these aircraft are smaller of nature, the noise level is much higher in the morning.

We oppose the proposed further managed growth of operation which envisions an increase to 18 million from the present 15 million travelers by 1985. We do recommend that there be a reduction rather than an increase in ensuing years, the reduction to be accommodated by Dulles and Baltimore-Washington International.

We also oppose the extending of the 650-mile perimeter. I was very gratified that the previous panel all supported reduced operations at National Airport, as long as they got what they wanted. We oppose the extension of the 650-mile perimeter not for any geographical reason—what is the difference between 1,000 and 900 miles—but we feel that this will eventually bring more pressure to increase the operations at National.

I try to be a realist, and the FAA has proposed what they call managed growth to 18 million. Being a realist, I think the FAA and the previous panel will be here in 1985 on a proposal to increase it to 21 or 23 million passengers. I am telling you that the

facilities are not capable of handling that increase, and I do not think the public will stand for it.

We applaud the FAA's proposal to promote and improve public transportation to Dulles and to BWI. We think this is crucial to alleviate the problems at National and spread it to the three airports.

We understand—and of course, I am not an expert—but there has been some previous testimony about the safety connected with the wide-bodied jets. I will not comment on that very much, because I assume that the FAA are the protectors of the public and their safety.

We also welcome the FAA's proposal to reduce the operating hours from 7 a.m. to 10:30 p.m. to 7 a.m. to 9:30 p.m., but we would recommend that if they do so, they enforce the rule, which they presently do not. Although they have given an exception to corporate and private jets, they do not enforce the rule with any regularity on the commercial planes using National Airport.

I did want to get back to one little item that is not in my statement, directed at Mr. Snyder. I appreciate his remark about people moving into the flight path and now not wanting to live with it. Although we are not representative of the entire area, my community consists of 115 homes, of which I have personally made a survey. Eighty-two percent of those families—and by the way, I am not one of them—moved in prior to 1966 when jets were introduced. They probably do not represent the majority in the Greater Washington area, because this is a mobile area, but they are people to be considered.

Mr. SNYDER. When did you move in?

Mr. FILLIPINO. Five years ago. I am one of the 18 percent.

In summary, we strongly recommend actions that would significantly reduce the traffic at National Airport over the next 3 to 5 years. We feel that, although we do not want to pass the burden on to other areas, we have had the burden for too long of disruption in our lives from the noise and air pollution. We feel an equitable solution can be arrived at by reducing the flights at National and diverting them to other airports, where it is shared, and the convenience is accommodated by hopefully Metro or some other rapid transportation.

Thank you, Mr. Chairman, for this opportunity.

Mr. ANDERSON. Thank you, Mr. Fillipino.

Our next witness is Mr. Frank Korf.

Mr. KORF. Mr. Chairman, I represent the Bellevue Forest Citizens' Association of Arlington, Va. In other words, I belong to the bunch of "spoiled brats".

Bellevue Forest is a residential area less than 6 miles northwest of the Washington National Airport runway, and somewhat south of Chain Bridge. The majority of homes were built before 1957, long before jets were introduced at National. I myself have lived there since 1956, so I was there long before we ever had any jet noise, and I recall very well that propeller planes only drifted along every once in a while; we hardly noticed them.

We are near the center of the northbound flyway, well within the NEF-30 contour, which the FAA admits receives the most intense noise generated by National next to the immediate arrival

and departure area of National itself, NEF-40. If you look at the contour maps turned out by FAA, NEF-40 just surrounds National. The rest of the worst noise impact is NEF-30.

If FAA plans prevail, Bellevue Forest will still be within the magic boundary in 1990, with even more air pollution and even more sustained noise. And planes, then as now, moving almost nose-to-tail overhead as they roar in and out of National.

We have trusted the FAA that jets could not and would not be introduced at National, and I quote, " * * * because National is not built, designed, or set up for jet traffic. Therefore, Congress built a new airport, in its wisdom."

FAA Administrator, Najeeb Halaby—the father of the Queen, by the way—testified before Congress in 1963. Now, that was a long, long time ago, and we thought jets would never be introduced into National. We then protested and we believe that our dire predictions actually have come true, and that today, we live in a noise and pollution slum.

We hope and pray that Congress will hear our moans and wails, as we read in the newspapers. The damage done by the excessive air traffic over our houses is twofold—noise pollution and air pollution. Both attack our properties as well as our bodies. Noise shakes the houses, the vibrations destroy national monuments, along with the roofs and ceilings under which we live.

But noise also has a direct impact on human health. It impairs the hearing, it increases blood pressure and heart rate, adrenaline is secreted at a higher rate, all producing a long-term effect. This was stated by Dr. Charles L. Elkins, Deputy Assistant Administrator of EPA, testifying to this effect before Congress on June 7, 1979.

While noise has been mentioned in these hearings quite frequently, little has been said about air pollution. The draft environmental impact statement admits on page 129, "With adoption of the proposed policy in 1990, the total emissions"—and I quote that directly—"the total emissions of all pollutants by particulate matter are expected to increase as shown below"—and underline the word "increase"—"carbon monoxide, 1,527 tons per year; total hydrocarbons, 350 tons per year; nitrogen oxides, 2,236 tons per year."

The DEIS then continues, "The airport-related pollutant concentration increases at all receptor points from base case conditions. This is due to the introduction of the wide-body aircraft and the resulting increase of surface transportation emissions due to the increased enplaned and deplaned passengers."

It is interesting that the FAA concedes that the introduction of wide-bodied aircraft will substantially add to the air pollution. I have never seen that otherwise mentioned.

The EPA in its letter of March 14, 1960, commenting on the supplement, flatly states, that it is, and I quote, "not in a position to endorse a policy that results in direct violation of these standards," meaning the Federal ambient air quality standards.

These pollutants not only deposit grime and slime on our properties, they affect our lungs and our blood. But not a word about the effect of air pollution on human beings is said in the SDEIS or in the DEIS.

We believe that expert medical testimony to the effect of overflights on human health must be included in the final EIS, and that this testimony has to be considered.

I also want to mention that the Secretary of the Interior, in his letter to the Secretary of Transportation on April 28, 1980, also commenting on the supplement, has questioned the allegation that National is a more convenient airport. We have heard today very interesting testimony—and I must say it is the first time that I have ever seen any figures on this question at all—from the National Capital Planning Commission. They mentioned a 1968 survey which found that at that time, 12 years ago, National was only convenient to about half of the passengers. I would say today, with the terrific growth of the areas of northern Virginia and Fairfax County, and also in the corridor between Baltimore and Washington, this percentage is considerably lower.

Also, having heard the testimony of the various cities which are concerned with the air traffic into National, we can understand that the commercial interests are important to them. But I do not think the overflights would outweigh the inconveniences which these commercial matters inflict upon us.

We believe that nobody, no matter where in the United States he lives, had the God-given right to land in downtown Washington, just as we have no God-given right to land in downtown Houston, Memphis, Jacksonville, Fort Lauderdale, Chicago, or any other place. We have to take the transportation as it is and the air transportation today has been moved out of the large cities.

Whoever comes to the Nation's Capital has to respect its monuments, its natural beauty, and its cultural treasures.

Let me add a few words about the ways to improve surface transportation to Dulles. The committee obviously has been very interested in the improvement of surface transportation. COG has made a study of it and has outlined certain improvements which could be made in two stages. First, an immediate action program which would include: (a) traffic priority for Dulles buses at 16th and K Streets, with loading area at the Capital Hilton for Dulles, National and BWI; (b) regular bus stops at Rosslyn Metro Station for National and Dulles buses; and (c) stops for Dulles buses at other Metro stations. Such service could be introduced immediately with very small expense.

Secondly, a long-term program has been outlined capable of satisfying the 1985 travel demands, to include more frequent bus service from Washington to Dulles. A Metrorail feeder system, more convenient service for northern Virginia patrons, development of a shuttle bus service to Dulles from West Falls Church Metrorail station, and development of a remote airport parking lot in the vicinity of the interchange between Dulles Airport Access Road and I-495.

These suggestions appear reasonable, inexpensive, and important in any evaluation of National Airport's future. I find no word about any of this in the FAA's impact statement, either in the draft or in the supplement.

As a matter of fact, I attended the hearings on the Dulles master plan, and I saw only a little draft of a station inserted, and I asked Mr. Wilding who was here today, "What do you intend to do about

the improvement of surface traffic?" and he said, "Well, if we need it, we will put it in."

Well, they put in larger and larger parking lots, if you look at the study, but that is about all which is to be done, or which they plan at this stage. None of it is included in the draft or supplement.

Ultimately, we believe a rail link should be planned to connect West Falls Church and Tysons Corner with Dulles, but the expense of such rail link has never been reliably estimated. Two years ago, the FAA mentioned a possible cost of \$140 million. Last week I several times heard the expense of \$1 billion. A study should be made of the feasibility of such link, of its actual expense, and also of the revenues which such link could generate. We are not only talking about expenses; we are talking about revenues.

Dulles, I think, is capable of generating considerable revenue.

Now, if Dulles would be integrated in such an overall transportation net, Union Station, now an underused "white elephant," could be used as a solution for the ticketing, baggage handling, and checkin problems of air passengers of the metropolitan area. A central terminal for all three airports, National, Dulles and BWI, it could receive and deliver all airport baggage, it could validate all tickets, and it could issue and reserve all tickets. Passengers arriving by rail, bus, or auto could immediately check in and transfer to the airport-bound buses or, when available, to the Metro system.

This could tie in with current discussions about the construction of a heliport to connect downtown Washington with Dulles and BWI. Indeed, this would offer a solution for people with pressing time problems and sufficient funds for helicopter service from Union Station and it would bring Dulles and BWI within easy reach of a busy traveler.

Though helicopters certainly make noise, I think it would actually be a comparatively small sacrifice, because we do not expect very heavy helicopter traffic, and it could be guided along certain routes.

Now I come to the introduction of wide-bodied airplanes. The films which we saw last week on Wednesday, shown by the Airline Pilots' Association of the effects of wing tip vortex on air space graphically project the potentially disastrous impact on obsolete, crowded airports like National. Though we have heard that the FAA has tried out A-300's under ideal conditions, I do not think we are convinced that these planes are safe.

I talked to the Airline Pilots' Association, and they mentioned the wide distances needed between such planes. I do not think it would provide any solution, either from the pollution standpoint or from the traffic standpoint.

The use of a scatter pattern to alleviate the concentration of noise and dirt might help some areas, but leaves others still under stress. The cardinal shortcoming of the draft EIS and the supplemental EIS, as we see it, is that they try to perpetuate the role of National as the principal among the three airports of the area, thereby assigning to National a role to which we think it is unsuited in every respect.

Final relief, therefore, in our opinion, can only come from a reduction of flights in and out of National. We therefore recommend:

First, the proposed policy's reduction in air carrier slots at National from the current 40 to 36 should be considered only a first step, to be followed annually by further slot reductions, to reduce all operations from a current 40 per hour to 20 per hour by 1985. In so doing, all flights should be included in the count, particularly the extra sections on scheduled shuttle service.

There is no reason why a plane does not exist operationally and is not counted, because it is a shuttle; it is a plane, nonetheless. And moreover, we believe that the 650-mile limit should be adopted.

Now, I heard a lot today about the unfairness of having some cities grandfathered in and others not. There is only one way to be fair, and that is not to grandfather in anybody.

We are also of the opinion that this is what Congress originally intended when it built Dulles as a long-haul airport, which would relegate National to the short-haul flights.

Second, the proposed policy's plan for reduction of air carrier scheduling and operation during evening and nighttime must be immediately adopted, and noise abatement procedures on landings and takeoffs at National be made emphatically mandatory and enforced by FAA.

We think that FAA has made good proposals in this direction, and we hope that it will adopt them as quickly as possible.

Third, commuter carrier operations should be increased from 8 to 12 per hour, and general aviation operations be continued at 12 operations per hour. Both commuter carrier and general aviation operations should conform to the general scheduling of operations during evening and nighttime hours. There is, in our opinion, no particular reason to except them. They may not be as noisy, but I think we are opening a door there to unwanted and unnecessary traffic noise.

Fourth, a regional citizens' and local government advisory board must be established to provide input to FAA on aviation policy questions in the metropolitan area. We believe that this is in the interest of the Federal Government, of our Constitution, and of our own rights.

Fifth, the Department of Transportation and Metro must take immediate action to provide frequent and reliable bus service, with provision for Metrorail-Metrobus interface, connecting Dulles with the District of Columbia and with National and, on a longer term basis, make arrangements to connect Dulles by rail with Metrorail.

We generally align ourselves with the recommendations of the Metropolitan Washington Coalition on Airport Problems and with the Metropolitan Council of Governments.

I come to the last point. This committee has asked for comments on the desirability of maintaining the Metropolitan Washington Airports as federally owned and operated entities. We believe that FAA ownership of National and Dulles is highly undesirable, involving that agency in a constant conflict of interest.

The FAA's principal mandates are to enforce aviation safety and to promote civil aviation. As airport owner, however, it becomes

part of the same interest which it is to regulate. Ten years ago, on June 12, 1970, FAA Administrator John H. Shaffer, before Congress, pointed out the difficulty of fairly negotiating contracts with the same industry that the FAA has to regulate, and the inconsistency of such role with the concept of federalism in which local government has a voice in public matters affecting their immediate interests.

I point out here the hearings before the Subcommittee on Aviation of the Committee of Commerce, U.S. Senate, 91st Congress, 2d session, on S. 3128. Such divestiture of National and Dulles would remedy the impossible situation that FAA plans run directly counter to the documented recommendations and positions of both the National Capital Planning Commission and the Council of Governments.

Secretary Andrus, in his previously mentioned letter, dryly remarked, "We would expect the FAA to comply with its own regulations." As it is, obviously the FAA does not and very often cannot.

We therefore adopt the previously made proposals that the States of Virginia and Maryland and the District of Columbia should be authorized to enter into a compact to operate the three major airports within the Washington-Baltimore area—Dulles, BWI, and National—returning the FAA to the role of supervisor of locally operated airports and regulatory of the air traffic between them.

I thank you for giving me the opportunity to be heard.

Mr. ANDERSON. Thank you, Mr. Korf.

We do have everyone's prepared statements. They do not have to be read entirely. If you could extemporize in the interest of time, we would appreciate it.

Ms. Burke?

Ms. BURKE. Mr. Chairman and members of the subcommittee, my name is Kaye Sloan Burke. I am president of the McLean Citizens' Association. This is an umbrella citizens' organization that encompasses the area from the Arlington County line, Tysons Corner area, out to Difficult Run.

I commend the subcommittee for recognizing local citizens' interests and concern regarding the safety and environmental problems resulting from the Washington Metropolitan Airports, primarily National Airport.

Over the years, members of the McLean Citizens' Association have become increasingly concerned about the safety and noise problems resulting from the FAA's use of air space over our homes. Because we live adjacent to the Potomac River corridor, we are in the National Airport flight path, which can bring up to 300 jets a day to our neighborhoods. We are unhappy with this burden of noise and watch with dismay the FAA's failure to fully utilize the modern facilities of Dulles airport.

While McLean residents suffer from the noise from National Airport jets, thousands of other area citizens cannot find a flight from Dulles, the airport closest to them, so they must travel to National for service, thus compounding the problem.

It is our contention that Dulles Airport, zoned so carefully by Fairfax County Board of Supervisors for growth is grossly underserved, and that the heavy concentration of jet aircraft at Nation-

al, set as it is in the middle of the metropolitan area, creates a safety and environmental hazard which exposes a large number of residents to dehumanizing noise pollution.

The FAA has taken the role that Congress intended for Dulles Airport and assigned it to National, making National and not Dulles the major jetport in our area, making it one of the 10 busiest in the United States.

There is a growing need for more jet flights at Dulles, and we believe that all area citizens would benefit from a 50 percent reduction of commercial jet operations at National. This would mean better service to Dulles and less noise for citizens in McLean as well as other areas in the metropolitan area.

In the past 10 years, Fairfax and Loudoun Counties have experienced tremendous growth. The expanding population and concentration of new industry in these two counties have created a greater demand for jet service at Dulles Airport.

Fairfax County, where part of Dulles Airport is located, is the fastest growing jurisdiction in the metropolitan area. Population projections estimate an increase of a quarter million people from 1975 to 1985. Our county's population has grown by almost 40 percent in the last 5 years.

If you look at where the major industrial developments are occurring in the Virginia area, Tysons Corner is growing by leaps and bounds, and in the eighties, one of the major growth areas for industrial development and office space will take place at Fair Oaks, which is at the intersection of Routes 50 and I-66.

Fairfax County will relocate their governmental center in that area. There is a current, new shopping center which will open this year, plus there are over 600 acres of land that will be developed into office area.

Loudon County, where the rest of Dulles is located, continues to experience the same kind of enormous growth. Within a 6-mile radius of Dulles, 10,000 new housing units have already been approved, and the county forecasts an additional 25,000 to 30,000 units in the years from 1980 to 2000.

Within a 6-mile radius of Dulles Airport entrance are 14,000 acres zoned for industrial use. The town of Leesburg is presently developing two new industrial parks.

Travel time to Dulles will be reduced upon completion of Route 66 and the connector from I-66 to the Airport Highway, making Dulles much more accessible to many citizens in the metropolitan area. The new highway system will be far better able to handle air passenger traffic than the busy commuter highways in and around National Airport.

In summary, the McLean Citizens' Association would like to make the following recommendations:

First, that there should be a 50-percent slot reduction at National Airport by 1985, and that if there is an admission of wide-bodied aircraft, it should be on a 1-for-2 basis only.

Second, that a true 650-mile perimeter limit for flights to and from National be observed.

Third, that the COG resolution to limit the total annual passenger level to 14 million be adopted.

Fourth, that the FAA's proposed policy for a 9:30 p.m. scheduling curfew, with airport operations ending at 10:30 p.m., be adopted.

Fifth, that better public surface transportation from McLean and Tysons Corner be provided to Dulles Airport.

Sixth, that each plane be counted at National Airport and that extra sections of scheduled shuttle service be included in the total limit of air carrier operations.

Seventh, that a citizens' advisory board be established, as recommended by COG, CAP, and the Virginians for Dulles.

Eighth and finally, on your question of the transfer of ownership of National and Dulles to a local jurisdiction, preferably the Commonwealth of Virginia is desirable. The transfer, in our view, is inevitable, and avoids the conflict of interest now faced by the FAA. The FAA cannot regulate and promote an industry at the same time.

Thank you for this opportunity.

Mr. ANDERSON. Thank you, Ms. Burke.

Ms. Cable?

Ms. CABLE. Mr. Chairman and members of the subcommittee, good afternoon. I am Marilyn Cable, and am vice chairman of the National Airport Operations Advisory Board of Prince Georges County which was appointed by County Executive Hogan to advise the county on National Airport operations.

We appreciate this opportunity to share with you some of our concerns about the operation of National and its future development. The board has prepared a written statement for the record. In addition, I have the following comments in behalf of the board.

Our concerns are fundamental, and extend far beyond the interests of the county and its constituents. The basic problems associated with National clearly affect large numbers of people with different interests. The solution cannot be resolved by catering to the most politically or economically influential, while ignoring the concerns of others and the facts at hand.

One of the facts about National is that it is a heavily utilized airport in the heart of an urbanized area, bringing over 600 airliners per day into within 2 miles of the center of the city. It is woefully overused, begging a major air crash.

National is difficult to fly into because of the restricted zones in the District and because its flight path is sandwiched in between those of Dulles and Andrews Air Force Base.

It is essentially a one-runway operation, and that runway is saturated. Just yesterday, a representative of the Air Line Pilots' Association said that due to heavy traffic loads, unusual weather conditions, and runway configurations, both aborted landings and last minute changes of runways are both hazardous and common occurrences at National every day.

Safety is an issue that cannot be ignored. It affects all of us, whether we fly, have friends or family who do, live under a flight path, own an interest in an airline company, or simply value human life.

Another fact about National is that it is a filthy beast. Its piercing scream and its bad breath all prey upon people and historic buildings in otherwise lovely spaces.

The noise and air pollution this monster generates has serious, damaging impacts on health, as pointed out in an EPA publication. For example, noise can cause permanent hearing damage. It has been identified as an important cause of physical and psychological stress, which has been directly linked with many health problems. It is suspected to lower our resistance to infections. Noise can interfere significantly with the perception of speech by children, as well as with the acquisition of speech, language, and reading. Noise can threaten fetal development and has been linked to low birth weights. Noise can make it difficult to fall asleep, and it can wake us. If sleep disturbance becomes a chronic problem, it can take its toll on health.

According to an EPA publication, "People do not get used to noise—the body continues to react. Constant exposure to noise is negative to your health."

Noise also interferes with the ability of people to perform normal functions of everyday life. Try to carry on a conversation with a neighbor on the sidewalk. Try to listen to the news on television or radio. Try to save energy normally used for air-conditioning by opening windows. Try to get your children to sleep with jets flying overhead every 60 seconds or so. Try to sleep after 7 a.m. on Saturday and Sunday mornings. Try to make a tape recording of something important to you. Try to call your children to dinner. All of these things, and more, are made difficult, if not impossible, by the constant barrage of flights overhead. Having any planes overhead at all is an intrusion, but being the victim of repeated flights is like being in combat.

One wonders if some Congressmen who do not think there is an intolerable noise problem associated with National would tolerate a flight path above the Capitol Building. Currently, planes are restricted from the area. Removing this prohibition would save flight time and fuel, because flights would cut 15 to 20 miles off routes. We suspect that Congress would never allow such a situation despite the time and fuel efficiencies that would result, merely because Congress does not want the noise.

Suggesting that people bothered by the noise relocate does not solve the problem. If people took that advice, thousands of vacant buildings would appear throughout the metropolitan area. In addition, it must be remembered that many of the buildings affected were built prior to the introduction of jets at National and they are usually the most abusive planes.

It is true that National is convenient to many people. But convenience is no longer a sufficient reason to subject our people, our visitors, our historic monuments, and grand spaces to the airport's degradation. A 30-mile stretch of the Potomac River has become a sewer of noise.

The cost of this convenience now far exceeds the benefit. National Airport is a bad habit that we cannot afford to support any longer. The truth is that people use National because the planes are there. If the planes operated from Dulles or BWI, then people would fly in and out of those airports.

Who gave anyone the inalienable right to fly in and out of the middle of Washington, to come and go anywhere desired?

Who has the right to convenience when it risks the lives and well-being of others? Is saving 20 minutes worth more than people's lives?

By airport standards, National is antiquated. Secretary Goldschmidt himself has said that National is a "dump". National was constructed in the 1940's for propeller aircraft, not for jets. Yet, the airport has essentially remained the same.

Instead of spending vast sums of money to expand National, it seems obvious that the Washington metropolitan area, and visitors to the Nation's Capital, would be better served if funds instead were used for rapid transit to and from Dulles and BWI.

National is the last major downtown jetport in the country except for San Diego, where a tragic loss of life recently occurred. Let us not wait until a horrible accident occurs at National to significantly reduce incoming and outgoing flights there. No airline service needs to be lost; planes can be diverted permanently to Dulles and BWI.

For the health and welfare of the people who live and work in the Greater Metropolitan Area, for the visitors who come to enjoy Washington, for the protection of its national historic monuments and its extensive natural areas and park and recreation system, we urge Congress to see that airline flights associated with National be reduced 50 percent and be diverted to Dulles and BWI, and to see that the necessary funds are made available for the construction of rapid transit lines to Dulles and BWI.

Of course there are other avenues through which people adversely affected by National can seek relief. But this moment is an opportunity for Congress to act with great wisdom, foresight, and in behalf of the common good. It takes courage to do what is right and fair and just and appropriate. We support you in doing just that, and we are anxious to work with you in making that goal a reality.

Thank you.

Mr. ANDERSON. Thank you, Ms. Cable.

Eric Cronquist?

Mr. CRONQUIST. Thank you, Mr. Chairman. I am Eric Cronquist, speaking for the Palisades Citizens' Association. This association serves northwest Washington, the area between the Potomac River, Foxhall Road, Porter Road, and the District line.

To us, there are two issues of fundamental importance for the future of National Airport. One is the issue of how to provide for a rational transportation policy for the next decade for the entire metropolitan area, and the second, of course, is the environmental impact of National Airport.

We know for a fact that the capacity of National Airport is more than fully utilized, while the capacities of Dulles and BWI are far from being utilized. If we consider these facts without probing into the reasons, one would be led to believe that the pattern of the metropolitan area with respect to demographic features, location of industry and trade, and similar factors that should affect the structure and mode of transportation, are such that interstate commerce is better served by National Airport than by the two other facilities in the area.

Consequently, massive investments to improve and update the handling capacity of National Airport would be required, because no industry can be efficiently operated through continuous overuse of its capacity.

When we look at the proposed policy, what, then, are the facts with regard to the localization issue? Is there a rational analysis of the transportation requirements of the metropolitan area geared to the proposed policy?

We unfortunately find that there is little in the proposed policy dealing with this particular issue. We think that it is of fundamental importance for a discussion of the continued use of National Airport that such basic research be undertaken.

We in this citizens' association, as members of the Coalition on Airport Problems, CAP, believe that there have been large changes in the last decade in the residential and location patterns in the metropolitan area, and we advocate that interstate commerce, in the broad sense of the term would be better served by a 50 percent cutback in the operations at National and a corresponding increase in the operations at the other two airports in the area.

We do not believe that such a cutback would represent a hardship for those users of National for whom this airport is cost-efficient. There will still be a sufficient number of flights at National, and an adequate number of flights. The advantage of a cutback at National would be that airlines will be able to fill their slots consistent with the demand in the marketplace, while developing alternative and supplementary flight schedules from the other two airports, thus providing the entire area with adequate transportation options.

The second issue, the noise issue, we simply believe that a four-slot-per-hour reduction as proposed now will not represent much of an alleviation in that sense, and particularly since these slots will be used by commuter aircraft.

Such a transfer of slots, continuing the present policy, is of course in keeping with transferring National Airport into a short-haul airport. But as long as jet carriers surround us with noise, the citizens in our area will still keep fighting the moral and legal battle to get rid of the noise intrusions.

The pollution and the noise intrusions are perhaps difficult to comprehend for those who are not exposed to it. The fact that National Airport is federally owned may have prevented a complete understanding of this problem. The local governments in the area have no direct vote and very little impact on the policies relating to National Airport, and this has resulted in a situation where, despite congressional efforts to create an Aviation Advisory Board, all decisions concerning National Airport remain unfettered by any advice formulated by the residents.

In summary, the metropolitan area needs a rational transportation policy. Last week's hearings, as a matter of fact, indicated to us that the airlines are holding Congress hostage, since they do not want to provide the balanced service that the area needs. We hope that as a result of these hearings, a comprehensive, rational, and responsible policy will be formulated for National Airport.

With respect to the noise issue, Mr. Chairman, the citizens—and I do not know whether I am facetious or not—but the citizens are

quite satisfied that a number of Members of Congress testified to the fact that they do not find the noise issue very important to them. We are happy because the concerned citizens in collaboration with the Council of Governments have proposed that the noise generated by National be scattered equitably over the District of Columbia. We have proposed—and the airlines, as a matter of fact, have agreed to this particular proposal—that all flights from National be scattered over a broad geographical area, starting at the end of the runway, as a supplementary procedure to the proposed change in the overall policy for National.

In order for the District of Columbia to be fully included, we are happy to hear that Members of Congress would be willing to reduce the eastern boundary of the present so-called restricted area so that a wide geographical scatter pattern can be obtained consistent with safety.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Cronquist.

I note that Mr. Garner of Advisory Neighborhood Commission 3-D of Washington, D.C. is not here. We do have his statement, and it will be made a matter of the record.

[The statement referred to follows:]



Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3-D
 (Potomac-Massachusetts)
 Washington, D.C. 20016

Statement of Joel H. Garner, Advisory Neighborhood Commission 3D
 before the Subcommittee on Aviation, Committee on Public Works,
 U.S. House of Representatives, June 19, 1980.

Advisory Neighborhood Commission 3D, elected to represent the views of the 15,000 residents in the Palisades, Spring Valley, and Wesley Heights areas of Washington, D.C., strongly opposes an increase in the use of National Airport. We support as a moderate and sensible short term policy (1980-85) the reduction of flights at National by 50%. We support the position of the Coalition on Airport Problems that National is grossly overutilized and that growth at National must be stopped.

I will not repeat the technical arguments which this committee has heard concerning the amount of noise which bombards our neighborhoods 18 hours a day, seven days a week, every week of the year. There are two essential problems with the noise; it is too loud and it is too frequent. While there may be engineering solutions to reducing the level of noise from any one flight, the more important issue is the frequency of flights into and out of National Airport.

The number of flights at National is the basic policy question and one which can only be resolved by the appropriate policy-makers who are fully informed of the impact and consequences of such a policy. Ever since National Airport began using jet-powered aircraft, local citizen groups from the District of Columbia and from Maryland and Virginia have sought to have the overall policy for operations at National Airport reviewed in a public forum so that all the impacts and consequences could be better known.

It is the Federal Aviation Administration, as you know, which had refused even to consider such a public discussion until it was forced to by Federal court rulings enforcing the Environmental Protection Act. It is as a direct result of such congressional action and Federal Court rulings that the FAA is currently engaged in a full-scale review of National's operations. I welcome the additional congressional interest in these issues reflected in the set of hearings arranged by the Subcommittee on Aviation. Congress too often is blamed for the dangerous overuse of National Airport. The parking and VIP service which members of Congress receive at both National and Dulles and the occasional, well publicized comments of a few Senators and Representatives has led many people to believe that the current policy at National Airport is exactly what Congress wants. I hope this committee will work to dispell the notion that the Congress wants or approves of the dangerous overuse of National Airport.

This notion can be dispelled in two ways. First this committee and the full Congress can insist that the FAA's policy for National Airport must be consistent with the safety and noise regulations appropriate for all our nation's airports. Second, the Congress can remove the FAA from its incompatible roles as the operator and the regulator of National and Dulles Airports.

In closing, I want to make it clear that Advisory Neighborhood Commission 3D and the citizens we represent are in no way anti-aviation. Many of us use and need the commercial transport provided by jet airliners. What we want is not only less noise in our homes but also more safety when we fly. The current policies at National are not, "an accident waiting to happen," but the deliberate consequence of misguided actions of the FAA. Those policies must change.

Mr. Allen Van Emmerik.

Mr. VAN EMMERIK. Good afternoon. My name is Allen Van Emmerik, president of the Cabin John Citizens' Association.

I will extemporize, and I will try not to repeat anything that has gone before, in the interest of time and also good order.

Mr. SNYDER. I like you already.

Mr. VAN EMMERIK. I hope you will when I am finished.

One reason why I am delighted to do that is because I have attended a number of hearings before a number of forums, and from the citizen contingent, I have been constantly amazed—I should not be amazed, just pleasantly surprised—at the wealth of intelligent, rational, spacious comment on airport policy.

It seems to me if even a fraction of this spaciousness were indulged in by those who create airport policy, there would be no need for us to be here today.

To describe Cabin John for a moment, Cabin John is a community of approximately 1,600 citizens. It is an old community, established long before 1975, but a going concern at that time. There are many multi-generation families there; an awful lot of people have lived there an awful lot of time. It is a lovely place to live. We like it very much—except for the aircraft noise.

Now, Cabin John exists at a place that we sometimes refer to as ground zero, right under the spot where the aircraft, after abandoning some slight pretense at noise control going up the river corridor, apply what the FAA is pleased to call "increased climb power". That is when they "slam it to her" and go off to wherever they are going. In so doing, we get the backwash; that is to say, on the take-offs, when the airport is in a north operational pattern.

It is a tremendous noise burden. I will not repeat what Mrs. Cable has said most eloquently about the various little detailed costs to each and every one of us—the inability to put kids to bed, the inability to get to bed yourself, the inability to carry on any reasoned conversation. It is a terrible burden, make no mistake about it. It is no small matter. It is not anything anyone gets used to. You just live with it, and that is all there is to it. It is a burden that ought to be spread, which is the summational fillip that Cabin John would add, in asking for the immediate implementation of a scatter plan, whatever the course.

As I say, Cabin John is at that 10-mile point just inside the beltway where the planes take off, where they really take off. And when they land, it is just as bad. They rendezvous sometimes right over my house. There is no way to conduct an ordered existence

under those conditions. We, as much as anybody else in this community work hard for our livings. We have as much right as anyone else to the quiet enjoyment of our homes. Yet we cannot have that when the weather conditions are wrong, when the planes just simply occupy our lives—not occupy them even during the times when they are supposed to. You have, and I hope not only will make part of the record, but will read, Cabin John's modest statement. When I composed that, it was well after midnight, and still the planes were going overhead, at 2- and 3-minute intervals, just the way they do at 7:03 in the morning. It never stops; it never seems to stop.

All of these proposals we hear about for now 18 million people to be handled at National, for an exceedingly modest decrease in slots but more people being handled, for an increase in the operating perimeter, all of these things seem to be self-perpetuating.

Today, we ask for 18 million; as Mr. Fillipino said before me, 21 or 23 million next. These things never stop. Another thing that just never stops is the apparent willingness to expand, to intrude upon our time after 10 at night. The planes just keep on going. This is not accidental. This is not by distress of weather. It cannot be, when there is such clustering between 9:30 and 10 of more traffic than those controllers can possibly clear by 10. This is a cynical attitude. It is a callous attitude. It takes no account of we, who at least at 10, ought to have some time to ourselves. The only time we have had to ourselves in years is when a snowstorm closed down National Airport. That was a blessed day—a day people still talk about—just like we talk about how we would like to get the trolley back out to Cabin John. But it is pie in the sky, because the planes will keep on coming, unless somebody puts a hold on them. That should start here.

We have a simple right to quiet. It is a right that we share with all people in the Potomac River corridor. We should have the right that everyone else enjoys to a no more noise burden than is simple and necessary. Unless the flights are cut back by 50 percent, unless the curfew is rigidly observed, unless all is done to use quieter engines and planes that will move people faster, there will be no quiet for all. We in Cabin John are entitled to have this wealth that stems from progress spread evenly throughout the entire Washington metropolitan area. All people benefit. All people ought to share in the cost. It is a simple moral matter. It is not a matter of special pleading. It is a simple moral matter. Cabin John should no more bear all of the noise burden than it should bear all of the tax burden or all of any other burden for this area. We deserve more consideration than we have had. We have lived under the volcano for 18 years. We have paid our dues. We feel sorry for those who must share the burden which we have carried alone, but it must certainly be shared, by all alike.

Now, the way to do this, it seems to us, is exceedingly simple. It is as simple as using all of the available resources. We are a three-airport city—or could be. But it is rather frivolous to speak of Dulles and Friendship as Washington metropolitan airports, when you can scarcely get to the places.

The three Washington area airports are united by an utter patchwork of buses, limousines, taxicabs, courtesy vans, what-have-

you, and private automobiles to boot, which we are not supposed to use. Unless there is a rational ground transportation policy to stitch all of the parts of this crazy quilt together in a reliable fashion, there is no sense talking about Dulles as a Washington metropolitan area airport.

At the same time, if stitched together, Dulles could be just as convenient as National. I think a lot of people overlook some of the real costs in time on the ground. It is not so much how long it takes to get, say, from this building right here to National Airport. Of course, that is a brief span of time, and it takes two or three times as long to get to Dulles; it need not, but it does now. But when you get to National, you have huge lines, and you stand in them. Perhaps the gentlemen of this House do not stand in line, but I do. When you get in the aircraft, you sit at the gate; because it is now policy not to taxi away until you really need your engines, you sit at the gate for a while. Then you sit out on the tarmac. Then you sit at the end of the runway, waiting for clearance. Then you sit next to an active runway, waiting for the incoming stuff to clear so you can cross it to get off to the next runway. The same thing happens when you land at National. These are all ground transportation increments that add up so that going to Dulles would be very, very little more, or perhaps not as much inconvenience as flying right straight out of National.

To us as simple citizens, it does not seem necessary to think very deeply about the desirability of working Dulles into the system, providing reliable rapid rail transportation, or until rail can be built, reliable rapid bus transportation, the kind that is not in private hands.

I had occasion to testify much the same way to Mr. Wilding, I think it was on February 20, at Key Bridge Marriott. And I pointed out that we should not be subject to the caprices of Greyhound. The very next day in the paper, I read of thousands of people being stranded at Dulles because of a wildcat Greyhound drivers strike. We should not be subject to that. We as travellers should not be subject to that any more than Cabin John, as ground zero, should be subject to all of the noise that comes from it. We have our rights; unless people are prepared to speak about condemning those rights, giving just compensation as a noise easement, then I think we have a perfect right to be heard in behalf of the quiet enjoyment of our homes.

And with this extemporaneous comment, I thank you very much for the time.

Mr. ANDERSON. Thank you, Mr. Van Emmerik.

It was suggested at last week's hearing that neighborhoods impacted by noise from National Airport are among the most desirable in the Washington area, and that housing prices in these areas are high and are increasing. Do the members of this panel think that this is an accurate assessment of the situation?

Mr. Van Emmerik?

Mr. VAN EMMERIK. I would like to answer that, since I started by saying that we like Cabin John. We like it not for its expensiveness, but for its variety. Cabin John is a real community, not a bedroom community. We have churches, a post office, commercial development, apartment houses, the works.

Cabin John is part of a complex—perhaps I did not set it up geographically sufficiently—we are 4 miles—we are part of a complex which includes Glen Echo, Glen Echo Heights, Bannockburn, Potomac, Cabin John, strung out more or less along McArthur Boulevard, the southernmost tier of Montgomery County. There is nothing between us and the river, nothing between us and the aircraft. There is a great variety in Cabin John. However, throughout that stretch, there are a number of very expensive homes. Indeed, Cabin John, to our great surprise, since most of us are blue collar retired people, people just trying to scrape by, there is a large development of \$250,000 homes going into Cabin John, and I would say within the next year, another 60 to 100 homes in the \$80,000 to \$250,000 price range will be built. If you take it out as far as Persimmon Tree, Potomac, that area, we are talking about some homes worth as much as a million dollars. And I would guess that the average worth of homes out there is well over \$150,000, taking the entire span from, say, the District line out about 7 or 8 miles.

Mr. ANDERSON. Mr. Korf?

Mr. KORF. Mr. Chairman, we have conducted an informal survey in Bellevue Forest. The houses in Bellevue Forest, I would say, are upward of \$150,000. We have found, No. 1, that the first, and very often the only complaint, that the citizens have is the airplane noise. No. 2, we have found, though we are a rather close-in location, the real estate prices have not kept pace with prices for other real estate which is not as impacted with airplane noise as ours. We have a definite impact, and we believe, damage due to the constant overflights.

I have, in my own house, had the ceiling repaired several times because the ceiling split, and that split in the living room is opening up every year, and I have done it again. We have considerable damage to our houses, and the people themselves know that the overhead noise is a nuisance. And we do not find that people as readily buy these buildings, which are very close to the city, in a beautiful area, as they would others which are not as much impacted by the airplane traffic.

Mr. ANDERSON. Mr. Fillipino?

Mr. FILLIPINO. That was mentioned earlier. I think we have a misconception about National Airport. National Airport is close to Washington, D.C. That is the magnet. The magnet is basically the Government. This House of Representatives is one of them. You draw private industry either into the District of Columbia—and that has been proven by statistics—or the outlying areas, and these people want to be close to Washington, D.C., not necessarily National Airport or any airport.

Mr. ANDERSON. Then, why are they clustered right around National Airport?

Mr. FILLIPINO. Because the closer they are, the better the commuting is.

Mr. SNYDER. But they move in there notwithstanding the noise.

Mr. FILLIPINO. Absolutely, I agree with you. But there are some people, and Cabin John seems to be among them, where there are residents who have been living there prior to 1966.

Mr. SNYDER. But they are going to build 60 new houses from \$80,000 to \$250,000 up there, notwithstanding the noise.

Mr. FILLIPINO. Yes, sir, I understand that. But I do not think National Airport drives the real estate values up in its surrounding areas. I think the seat of Government does.

Ms. BURKE. If I might make a comment, of the various groups represented, I must say that McLean could do quite well on the listing of houses. It will make a difference. Like Cabin John, McLean does have a variety of housing types, housing prices. If you look back at the history of McLean, it used to and still is, to a great deal and extent, the estate area. There makes a difference in some of the areas of McLean where the flight patterns go over into the pricing of the houses there. There are some areas that are more directly affected. But I do agree with the other speakers that what makes the price of the house in McLean go high is other factors that have a great deal to do with the location, where the major industries and new corporations are putting their houses. It is the employment location. And you must realize that McLean is impacted by the noise both from National and Dulles.

And as you remember in my statement, we are supporting a reduction in National and increasing it at Dulles. So any way you look at it, we are going to get the same noise; it is just from different areas.

Mr. ANDERSON. A shift in traffic from National to Dulles seems to call for a dramatic improvement in transportation access to Dulles. Some forms of improved access could be very expensive. For example, we have heard estimates that it would cost a billion dollars to extend Metrorail to Dulles Airport. What forms of improved ground access do the members of the panel favor, and how do you think we should pay for this?

Mr. Korf?

Mr. KORF. Mr. Chairman, I think I have pointed it out in my statement. There is an excellent study out done by the Council of Governments, which I have mentioned. This study is very detailed, and it particularly goes into the connection between Metro and Dulles.

Now, you have today already an extension of the Metrorail into Ballston. For instance, you could tomorrow morning have buses standing at Ballston and going from Ballston to Dulles. There would be no difficulty.

I have inquired of the Northern Virginia Transportation Agency. I said, "What plans have you made to improve service?" He said, "We have not been able to make any, because right now, I think Greyhound quit on us. We have a temporary agency there, which is limo, and they do not have any buses. Right now, we cannot do anything to have even decent transportation to Dulles." We believe that the Government should enter this void and really organize a transportation which has already the network there. We have roads there, we have Metrorail, and we have buses, and we can put them into operation.

Mr. ANDERSON. How do you feel this should be paid for?

Mr. KORF. The people who use it. If I go from my home in Bellevue Forest to Dulles, I pay \$20 for a taxi. I will be very happy

to pay several dollars to go on mass transportation, and I think so will be everybody else.

I want to mention one point which I do not think was touched on, and I have not really found the solution to it. They are now building I-66. I-66 has a median strip which I think belongs to the Federal Government and the State of Virginia, which could be used as a roadway for rail transportation. I have not seen any detailed study how it could be used, but it definitely could be integrated. That is another possibility.

There are many possibilities, but the FAA has not considered any in its outline for the environmental impact statement. I can quote you—and I think you have it in my memo—that there is nothing additional to be done nor need to be done at this time to improve the transportation to Dulles. That, as far as I recall, is in the EIS, in the DEIS, and in the supplement to it. There are plenty—we would be very happy to submit to this committee the study of COG. It is a very inexpensive solution.

Mr. ANDERSON. Ms. Burke?

Ms. BURKE. I think the comment made that the increase of dependable bus to and fro, as mentioned when 66 is completed and the connector from 66 to the airport road, which some of that is under construction, when that is completed, if you run buses, and there is dependable bus service back and forth there, I think you will find that the access in the use of Dulles will alleviate the problem. That will be an economical short-term effect. I do think that studies need to be made, as mentioned, to the surface rapid rail in the median strip for a long-term effect. That will be more costly, and the funding on that would probably have to come both from State appropriation, regional appropriation, and Congress, or Federal.

Mr. ANDERSON. Some statements from the panel support a perimeter rule for operations at National. Do you believe that establishing a perimeter helps reduce noise, or is there some other justification for a perimeter rule?

Mr. Fillipino?

Mr. FILLIPINO. No, I do not think the perimeter rule will decrease noise. But I guess I am skeptical, as I stated earlier, that the previous panel of airport directors are only interested in getting their foot in the door, and then more pressure will arise for 21 to 23 million passengers. The overall effect in the long term will be more flights and more noise.

Mr. ANDERSON. Do the members of this panel believe that the FAA does an adequate job in consulting the communities on its airport policy decisions? Can you suggest any additional mechanisms for this purpose?

Mr. Korf?

Mr. KORF. Sir, I have participated during the last few years in practically all the meetings between the FAA and the public, our people, mostly in northern Virginia. I have been at the hearings, and I have been in conferences with Mr. Bond, and some of our people were in conference with Mr. Goldschmidt.

Congressman Fisher has tried very hard to get a dialog started between the FAA and us. We have not found that the FAA is willing—maybe it is not capable of—having a real dialog.

And we have not any input at this time into FAA policy.

Mr. ANDERSON. Do the members of this panel think there should be a regional airport authority to manage the Washington airports, instead of the FAA? If you think this would be desirable, we would appreciate your views on how the authority would be constituted, and how it would be possible to avoid the types of disputes that have arisen within the authority that governs the Metro system in this area.

[No response.]

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Mr. Cronquist, when did you move into your present accommodations?

Mr. CRONQUIST. There were people before me—I have been there for 7 years, and the reason I moved into that location was that I could not believe that the situation as far as noise is concerned would be that serious.

Mr. SNYDER. Ms. Burke, when did you move into your present accommodations?

Ms. BURKE. When I was 2 years old. I started out in Arlington, and I have been a resident of McLean for—

Mr. SNYDER. No, your present accommodations.

Ms. BURKE. I have been in my house for 7 years; my parents' house, which is also in McLean, I have been there for 20 years.

Mr. SNYDER. Ms. Cable?

Ms. CABLE. We moved into our house 2½ years ago, and at that time, there was no airplane noise whatsoever over our house. Since that time, there has been a considerable change, and we suffer tremendously, and we are sorry that we live there.

Mr. SNYDER. Mr. Van Emmerik?

Mr. VAN EMMERIK. I would like to answer your question and be heard further on that. I moved in on March 4, 1976. To answer further, I may say that I am astounded to hear such a position espoused in the greatest deliberative body in the democratic world. As Thomas Jefferson said, "We are not a nation, some of which are born booted and spurred, and the others saddled, ready to ride." We have a right to live until somebody decides under the Constitution to take that from us.

Mr. SNYDER. Well, the number of slots and the perimeter decisions, which is what we are having this hearing on, were established in 1969, and that has been the same since that time. And some of us, I think, are falling on the side of wanting to leave it like it is, as opposed to the 18-percent reduction that the FAA comes up with. That is not trying to saddle and spur anybody who moved in here since 1969.

Mr. VAN EMMERIK. No, this is true, except that I had not heard that anybody had to condition his right to live where he chose in this nation on a noise nuisance maintained—

Mr. SNYDER. You are absolutely right, but if you want to move in where it is noisy, that does not mean that you have the rights to saddle and spur the airport and move it.

Mr. VAN EMMERIK. No, but it does mean that if I move in someplace, I have a right to stand up for my rights, and my rights are to be spared unnecessary noise. You perhaps overlook Cabin John's position, which was that we are ready to bear our fair share

of progress and the noise that goes with it. We are not ready to bear an unfair share; neither I, as an individual, am ready for that, nor are the people for whom I speak.

Mr. SNYDER. Those of us who take the position that it probably ought not be changed are not asking you to bear a bit more than has been in existence since 1987.

Mr. VAN EMMERIK. Well—I don't—

Mr. SNYDER. Mr. Korf, I was interested and do not really understand the tons per year of the various chemicals that you relate on page 129 of the environmental impact statement, which you quote accurately from the statement, which I checked.

But as I read that, it said, "With adoption of the proposed policy by 1990, the total emissions of all pollutants", et cetera, are going to be the numbers you listed. Now, if, in fact, the numbers of flights are not increased, and if in fact the better engines come into line, the pollutants from aircraft will not increase by 1990, but in fact, that figure as I read it is the total emissions of all pollutants, and you are cranking into that—or whoever prepared the statement is cranking into that—all of the sources and not just increased aircraft sources.

Am I understanding that correctly?

Mr. KORF. No, Mr. Snyder. I understand that this is an increase which comes from the airplanes. And it is my understanding that this is a direct result of the increased overflights.

Mr. SNYDER. Well, I will ask counsel to try to study it a little bit more, because I do not get that understanding in my quick perusal of it, as you were testifying and as others were testifying. I would anticipate that if, in fact, that increase and bring in wide bodies and more people, there is more ground traffic, and that ground traffic could be as an indirect result of the overflights.

We have to go vote, Mr. Chairman. I could ask some more questions, but I will defer.

Mr. KORF. I may add something to that—

Mr. SNYDER. No, I do not know that I want to belabor the matter any further. I will spare them and myself the problem.

Thank you.

Mr. ANDERSON. Thank you very much, all of you, for your presentations. We will recess at this time, and as far as we are concerned, this panel is completed. We will hear from the final panel when we come back in about 15 minutes.

We stand in recess.

[Short recess.]

Mr. ANDERSON. Our final panel today consists of William Burt, counsel for Piedmont Aviation; Richard Skully, senior vice president of operations, Air Florida; Benjamin G. Griggs, Jr., vice president, Northwest Airlines; Capt. Tom Buttton, senior vice president, Eastern Airlines; and J. W. Rosenthal, counsel, Midway Airlines; and Mr. Jack Bowen, vice president, public affairs, Midway Airlines.

Please proceed, gentlemen. We do have all of your prepared statements. We hope you would extemporize, in order to save time.

[The following statements were received for the record:]

TESTIMONY OF THOMAS H. DAVIS, PRESIDENT OF
PIEDMONT AIRLINES
BEFORE THE AVIATION SUBCOMMITTEE OF THE COMMITTEE ON
PUBLIC WORKS AND TRANSPORTATION

My name is Tom Davis. I am president of Piedmont Airlines. I am testifying here today because I firmly believe that the proposed FAA Policy for Washington National Airport, combined with the proposal to auction slots at that airport, would change the basic character of Washington National from an airport intended primarily for short and medium-haul service, to an airport giving a clear preference to long-haul service. The result would inevitably be a drastic and extremely damaging reduction in the air service received by nearby small and medium-sized cities.

Piedmont supports the position of the ATA opposing the reduction in certificated slots at Washington National, and we have submitted detailed comments to the FAA in support of our recommendations. I ask that those comments be received in the record.

The FAA proposals are basically these: First, shorten the scheduled operating hours at Washington National and reduce the number of permissible hourly slots for certificated air carriers. Second, eliminate or modify the 630-mile nonstop perimeter rule to permit nonstop flights to and from Washington National from distances as far as 1000 miles. Third, permit two and three-engine wide-bodied aircraft to operate into Washington National, instead of being required to serve Dulles or BWI, as at present.

The proposal to shorten the operating hours and reduce the number of certificated slots stems primarily from pressures from noise environmentalists, and from those seeking to enhance service to Dulles at the expense of Washington National Airport. The fact that the aircraft operating

at Washington National are each year becoming more quiet, as the result of increasingly stringent FAA noise requirements, is seemingly overlooked. The proposal would, in fact, prohibit air carrier schedules entirely after 9:30 p.m. Washington National presently has one of the more severe airport curfews in the Nation and the proposal to advance the curfews to 9:30 seems to us like "overkill".

Washington National has always been regarded as the short and medium-haul airport for Washington, D.C. Such a policy, at Washington National and other large cities around the world, has been based on the accepted fact that air transportation in short-haul markets loses its effectiveness if surface times are too prolonged. This proposal to invite long-haul flights into Washington National, inevitably at the expense of reduced service to close in points, at a time when the allocation of slots is already a problem, is difficult to comprehend, and we oppose it.

The third piece of the proposal is to permit two and three-engine wide-bodied aircraft at Washington National. We have no wide-bodied aircraft at present, but no wish to oppose this proposal if it would be of substantial assistance to the traveling public and would not result in a reduction of slots available for service to nearby communities.

In short, it seems inescapable to us that each of the above mentioned proposals is likely to aggravate the availability of operating slots at Washington National. Unfortunately, and perhaps most importantly, the proposals that I have mentioned are not the end of the hazards ahead for short and medium-haul transportation to Washington National. The FAA is also seriously considering a proposal to adopt an auction system for allocating slots among carriers. Inevitably, the carrier with the longest

flight could afford to pay the most for a slot, and the result would be that slots would increasingly go to the long-haul markets. For example, an Eastern flight to Miami generates about twice the passenger revenue of a Piedmont flight to Charleston, W.Va. That means that with the same percentage of revenue, a Miami flight could bid twice as much for a slot as could a flight to Charleston, W.Va. The auction proposal would make a bad situation worse by giving the long-haul markets a heavy priority in obtaining the few slots available. Again, the shorter, smaller markets would be the losers, and much of the long-haul traffic which Dulles now receives and needs would be "bled off" to Washington National.

Piedmont provides service between Washington National and 25 cities in six nearby states. In our comments to the FAA, we submitted a detailed calculation revealing that under the proposed policy, approximately 21 of those 25 cities would suffer from reduced service. Washington National service to those cities would be reduced by approximately 47 percent, inconveniencing an estimated 1.3 million passengers. That service deterioration would extend throughout our system, affecting 8 cities in Virginia, 4 cities in West Virginia, 7 cities in North Carolina, plus one city each in South Carolina and Kentucky. Eleven of those cities are completely dependent on Piedmont for service.

Service to Washington National is of unusual importance to close in cities because it is the major connecting airport for the South Atlantic area. There are more connecting passengers at Washington National than total passengers at Dulles and BWI. The FAA proposal would almost certainly destroy the quality of connecting service provided at Washington National.

Taken together, the FAA proposals to reduce slots and utilize a slot auction process is the most serious threat to air service provided to cities served by Piedmont that I have experienced during the thirty-three years of our operation. However, if for reasons not apparent to us, it is felt that some or all of these proposals are absolutely essential, at a very minimum we urge that the rules set aside the same number of slots for cities within 300 miles (excluding New York) as are utilized today. Under that 300-mile provision, about a quarter of the slots would be reserved for short and medium-haul service. Thus, three-quarters would still be available for long-haul flights. Those long-haul cities would continue to be well served, because they typically have more frequent service and because many of them will benefit from the increase in seats resulting from the proposal to allow wide-bodied jets at Washington National. Details of our 300-mile proposal are set forth in the comments we have filed with the FAA.

It's important to understand that the proposals would decimate Washington National service to a far greater extent than the percentage reduction in slots. The reason is that the loss of one Piedmont slot would not only eliminate service to the first city served, but to a number of other down-line Piedmont cities. All of those cities would be victims of the proposed FAA policy.

One other thing should be made clear. The loss of certificated service at the cities we serve will not be offset by any proposed increase in commuter slots. Although the commuters provide significant small city service, certificated carriers such as Piedmont provide far more service. In the States of Virginia, West Virginia, and North Carolina,

Piedmont serves three times as many small cities as the commuter airlines. Overall, at Washington National, we provide more frequencies and four times the seats to small and close in cities than all the commuters combined. If small nearby cities are to have reasonable access to Washington National, commuters alone cannot do the job.

In summary, I strongly urge that the present status of Washington National Airport be preserved as the primary airport for short and medium haul service to nearby cities and states, and that additional service to more distant points utilize Dulles or BWI, to the extent that slots are not available at Washington National Airport. Washington, D.C., is fortunate in that it has three fine airports, one of them close in for the close in service, and two of them further from the city for service to more distant points. That distinction should not be ignored or destroyed. The present method of allocating slots at Washington National may not be perfect, but it is vastly superior to any of the alternatives presented to far. Thank you very much.

STATEMENT OF
 RICHARD P. SKULLY
 SENIOR VICE PRESIDENT - OPERATIONS
 AIR FLORIDA, INC.
 ON THE WASHINGTON NATIONAL AIRPORT POLICY PROPOSAL
 BEFORE THE
 AVIATION SUBCOMMITTEE
 COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
 U.S. HOUSE OF REPRESENTATIVES
 JUNE 19, 1980

Statement of Richard P. Skully
Senior Vice President - Operations
Air Florida, Inc.
Before the Aviation Subcommittee
Committee on Public Works and Transportation
U.S. House of Representatives
on the Washington National Airport Policy Proposal
June 19, 1980

My name is Richard P. Skully and I am Senior Vice President - Operations for Air Florida. Prior to joining Air Florida in March of 1978, I was the Director of the FAA's Flight Standards Service and I held this position for over three years. I also held the position of Director of the FAA's Office of Environmental Quality for three years. I held various other positions with the FAA over the 31 years I served with the agency. I hold a current air transport license which certifies me to operate various large jet air transports.

Air Florida very much appreciates this opportunity to express its views on the FAA proposals to change its current Washington National Airport operating policy. Since April 1979, Air Florida has been serving the metropolitan area through Washington National Airport and consequently, we have a very keen interest in the outcome of the FAA's proposed rulemaking.

I know you have been listening to testimony for two days on this important subject and I do not wish to go

over the same ground that has already been covered. But I do not believe you have received testimony from a carrier such as Air Florida, which not only is a new aggressive low fare entrant into the ranks of the airline industry, but a relative newcomer to Washington National Airport as well. I think Air Florida brings to this issue a somewhat unique perspective and I wish to spend my time today reviewing this briefly with you.

First, I would like to acquaint you with the history of Air Florida's service to the Washington area and to describe the scheduled service we currently provide through Washington National Airport.

Shortly after Air Florida received its first interstate scheduled authority under the then recently enacted Airline Deregulation Act of 1978, Air Florida chose to commence unrestricted low fare Florida-Washington services. But you may be surprised to learn that these services were originally provided via Dulles International Airport. I mention this bit of history because I know you have heard a good deal of testimony about the use of Dulles as a substitute airport for Washington National. However, providing service through Dulles may not be as easy or desirable as some may claim.

While as I say, our first service to Washington was provided through Dulles International, it was unfortunate

that Dulles' airport management was not prepared to accommodate the operating needs of Air Florida. Air Florida was unable to secure suitable counter and back office space at the airport. Further, Air Florida was not permitted to make use of the more desirable and conveniently located ramp area from which we could pick up and discharge our passengers without the necessity of utilizing the costly and time consuming Dulles mobile lounge system. Frankly, we found the attitude of the airport management on these issues rather confusing and contradicting, since we had thought that the policy of the FAA was to encourage service to Washington to be operated through Dulles. It was indeed unfortunate that Air Florida could not resolve our several differences with the FAA and hence, we turned to Washington National as our base of operation in the area. We also chose to serve through Washington National because we believed the potential traffic pool to be larger than that available at Dulles -- a judgment which has been proven to be correct.

Air Florida has been providing service to Washington National since April 28, 1979 after having successfully obtained a sufficient number of slots through the CAB approved Airline Scheduling Committee process. No Air Florida flights to Washington are presently operated via Dulles.

Our current spring/summer schedule of flights includes unrestricted, low fare service to Florida, at discounts

of roughly 50% of the basic coach Washington-Florida fare; the only nonstop service to Toledo from Washington; and three times daily service to White Plains, serving the suburban New York and Connecticut communities.

This service requires 12 take-off and landing slots which is the number we received from the latest Scheduling Committee meeting. Air Florida is enthusiastic about these flights and we believe they represent valuable benefits to the traveling public. Therefore, we are very concerned were the number of available hourly slots to be arbitrarily reduced, as the FAA is proposing, so as to preclude the continuation of these services. Likewise, the shortening of the hours of airport operation, as is being proposed, would have an adverse impact on Air Florida's Washington services.

First consider Air Florida's newly instituted B-737 jet services to White Plains. Air Florida's three daily round trip flights in this market were inaugurated on April 27 of this year and hence, are still very much in the developmental stage. Not all of the three round trip flights are generating sufficient levels of passenger traffic, as they ultimately must be able to do, to insure their operation on a long term basis. But, Air Florida is committed to the market and we will give each of these flights a chance to develop, because we believe in the market's long run potential.

But, if the number of available slots is arbitrarily reduced, or the length of airport operational hours curtailed -- then obviously these newer services -- which generate less revenue per flight than flights in more mature markets -- will be the first to be curtailed. The same would unfortunately be true for flights to smaller communities which generate less revenue per flight than do services to cities like Chicago, Boston, Atlanta or New York. Hence, an arbitrary reduction in carrier access to Washington National will create a disincentive to continued service to small communities as well as a lessening of market developmental efforts as each carrier strives to maximize its flight revenues on its limited number of Washington services. Air Florida does not believe that this result is in the best interest of the traveling public, or the carriers which serve Washington National.

The arbitrary reduction in the level of Washington National service will also be felt by Air Florida and its operation of our attractive unrestricted low fare services to Miami, Ft. Lauderdale and West Palm Beach. These services, which have served as a competitive stimulus to the traditional Washington-Florida carriers like Eastern and National, are offered with none of the usual fare restrictions imposed by our competitors. That is Air Florida's passengers do not

have to purchase their tickets in advance; they do not have to stay at their destination any minimum or maximum period of time and most importantly, our fares are made available at discounts of approximately 50 percent of the normal coach fare on every seat on every flight we operate to Florida.

This unrestricted low fare service was precisely the kind of service the supporters of airline deregulation thought would occur if pricing controls were lifted from the industry. However, Air Florida is one of the very few carriers to adopt this as a basic pricing philosophy. Therefore, elimination of its unrestricted low fare service, which is possible under the FAA's proposal, would represent a setback to the deregulation movement and would eliminate an important competitive spur to the industry.

Exactly how will the reduction in slots cause the demise of these low fare services? One of the more probable effects of slot reduction and operating hour curtailment would be adoption of alternative slot allocation methods -- the most often suggested being a slot auction which we understand will be the subject of a future FAA rulemaking proposal. Clearly, such a system of allocation will cost the airlines millions of dollars annually as they will have to literally buy the right to serve Washington National in the auction process. If Air Florida is forced to pay for

the right to serve National over and above the landing fees and other charges it presently incurs -- our low fare services, with their inherently thinner profit margins, will be adversely impacted to the point where it is possible they could no longer be profitably operated in the market. In this regard, the suggestion made by the FAA that service to Florida will not be adversely affected by its proposed rulemaking is simply not correct in Air Florida's view. No flight would be immune to possible elimination as a result of the FAA's curtailment plans and certainly low fare services of the variety operated by Air Florida would be particularly susceptible to reductions if an auction regime were established.

One of the primary goals of the Airline Deregulation Act was to foster new low fare services. It makes no regulatory or economic sense to adopt a Washington National Airport policy which runs counter to the goals of the Airline Deregulation Act and which can destroy the substantial progress that has been made to date under the new enlightened regulatory regime.

As Air Florida understands it, the reason the FAA is proposing to reduce the level of air carrier activity at Washington National Airport is to accommodate those who have complained that the airport is not a good neighbor and to reduce the aircraft noise produced by carrier operations at

Washington National. In other words, the objections are based in large part on environmental grounds and not safety considerations, upon which the FAA first caused the number of hourly operations to be limited when it adopted its high density airport rules. That is to say the 11 year old High Density Traffic Rule found in Part 93 of the Federal Aviation Regulations was promulgated on the basis of asserted limitations on airport and airway capacity at Washington National and three other airports. But despite improvements in the capacity of the nation's air traffic control system, airport access to National has never been increased over the past 11 years. Now the FAA is proposing a reduction in the number of slots, without any consideration being given to either the original rationale for their imposition or whether the original limitations are still justified in light of the increased capability of the nation's air traffic control system.

Since the noise justification for the proposed rules has been raised, it will be worth a minute or two to discuss it here today. It was just a few months ago when the Congress mandated that the carriers must take certain defined actions to come into compliance with the FAA's noise abatement regulatory program -- Part 36. These rules which embody a comprehensive scheme of federal regulation of

aircraft noise were the subject of lively debate in the Congress, and represent a cohesive national approach to the issue of aircraft noise. Air Florida and the remainder of the airline industry are working hard to bring the civil aircraft fleet into compliance with these new regulations. Air Florida, as a responsible carrier certainly desires to be "good neighbors" to those living around the airports we serve. Indeed, it is many of these same individuals on whom we depend for our corporate existence.

But Air Florida does not believe it appropriate from a federal regulatory point of view, to graft onto this recently enacted regulatory framework, various local solutions solely for the purpose of accommodating specific demands of local communities. Indeed, were this to become a pattern, then every local airport operator would be free to devise local noise standards which may very well conflict with the comprehensive regulatory scheme which was so recently enacted by the Congress. Such an approach would not be consistent with the accepted principle that aircraft noise regulation must be accomplished on a federal level.

While I am not a lawyer, I do understand that the Airline Deregulation Act did include a specific provision preserving to airport operators the right to exercise their proprietary rights and powers, and Air Florida respects

those powers. But I am advised that the courts have held that these rights must be exercised on a non-discriminatory basis and cannot be arbitrarily imposed. These limitations on airport operator proprietary powers are needed to protect and preserve the federal government's necessarily exclusive control of civil aircraft operations. But, this pervasive federal regulatory regime will surely be jeopardized if purely local solutions can be permitted to compromise the in place regulatory framework. For this reason, we urge the Subcommittee to very carefully consider the impact of the FAA's proposal on the overall pattern of federal noise regulation to insure the integrity of the recently passed noise legislation.

What then can be done to accommodate the views on the various sides to this issue? Air Florida believes there are several viable alternatives. Air Florida supports the position of the Air Transport Association, which was presented last Wednesday, calling for a greater number of airline operations during those hours when the ambient noise level is high and reduce them when it is low. The ATA demonstrated that such a restructuring of the allocation system can be accomplished without exceeding the current limit of 60 total operations per hour. The ATA proposal also had the benefit of substantially reducing sensitive early morning and late evening hours, particularly on Saturdays and Sundays.

Air Florida also strongly supports Congressman Levitas' recently adopted Committee amendment to H.R. 6721, reauthorizing the Airport and Airway Development Act of 1970, which directs a study of the issue of allocation of airport facilities and airspace. In light of the need to preserve the integrity of the federal regulation of all civil air transport activities, safety and economic, no action should be taken by the FAA requiring a new slot allocation system such as an auction, at least until the nationwide implications of such a regulatory regime has been fully explored as called for by the House ADAP legislative proposal.

Further, Air Florida strongly believes that the issue of access to Washington National should be left to those who have the expertise in carrier scheduling and operations -- the airlines serving Washington National. Developing an airline schedule, which accommodates marketing and operational demands, is an extremely complex decision making process which requires years of experience to perfect. No government agency can begin to replicate this process and to do so in a way that will not unfairly discriminate against one community or carrier over others. Therefore, we urge the FAA's proposal be carefully reviewed for the express purpose of insuring that the judgments of federal bureaucrats

will not be permitted to be substituted for those of carrier management.

As much as any single carrier, Air Florida is a creature of the Airline Deregulation Act. We have grown and prospered, at least in part, because the federal government no longer controls every minute aspect of our corporate life. We are very much free to chart our own course and to market our product in the way we think best. And while all of the regulatory constraints have not been removed, carriers are freer now than they have ever been to manage their own corporate destiny. Therefore, it is discouraging to see new federal regulatory proposals which will take back the freedom which the carriers only recently acquired. The rather short experience the industry has had in a deregulated environment has, we believe, proven to be successful. Do not turn back the clock and permit the FAA to once again regulate our conduct in the absence of a showing that such regulation is justified in the interest of safety and other legitimate considerations. Air Florida believes that the FAA's recent proposals will jeopardize our ability to continue to successfully offer services to the Washington area and therefore, we urge close Congressional scrutiny of this rulemaking action.

Northwest Airlines, Inc.
Minneapolis-St. Paul Int'l Airport
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WASHINGTON NATIONAL AIRPORT

Statement by Benjamin G. Griggs, Jr.
Vice President - Assistant to the President
Northwest Airlines, Inc. on Washington
National Airport Policy in Hearings
before the United States House of Representatives
Committee on Public Works and Transportation,
Subcommittee on Aviation,
June 19, 1980

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE

My name is Benjamin G. Griggs, Jr., Vice President -
Assistant to the President of Northwest Airlines, Inc. My responsi-
bilities include the planning and supervision of the flight opera-
tions of Northwest Airlines.

I am here today to discuss with you that unique national
asset -- Washington National Airport -- the close-in, convenient
and economical means of transportation for most of you to visit
with your constituents and they with you. Northwest Airlines is a
member of the Air Transport Association and supports the testimony
given to you by that organization. We do, however, feel obligated
to amplify the points discussed in that testimony because of the
unique aspect of Northwest's service to Washington National Airport.
We are also aware of other testimony and the Environmental Impact
Statement prepared for the Department of Transportation-Federal
Aviation Administration which controls and operates the airport.
We will not duplicate this other testimony and data but will rather

give you information and data which is peculiar to the Northwest Airlines position and status with regard to Washington service and tell you why our position, in differing from many others given you (except that of ATA, which we support) deserves your serious consideration. Our desire is to highlight for you the following subjects:

- . Northwest Airlines' pattern of service at Washington National Airport -- a service characterized by the broad territorial constituency served, the consistency of service throughout the years and the prominence and importance of Northwest's service to the markets and areas concerned.
- . Washington National Airport -- a unique and unrivaled national asset requiring an equality of access for United States citizens.
- . The natural constraints on service to and from Washington National Airport -- constraints which are understandable to all United States citizens.
- . The importance of relatively distant, non-congested hubs -- such as Minneapolis-St. Paul, Minnesota -- in providing good access to and from Washington National Airport.

- . The noise issue -- Northwest Airlines' record in noise abatement and the quieter aircraft available to serve Washington National Airport.
- . Widebodies -- why they're needed and how Northwest would put them in service at Washington National Airport safely and efficiently.
- . What Northwest Airlines needs in the form of government policy and within the natural constraints of Washington National Airport to continue its pattern and record of service in a growing market.

A few more words on each of these issues will clarify the points being made and develop fully Northwest's status and position in this matter.

I. NORTHWEST AIRLINES' PATTERN OF SERVICE AT WASHINGTON NATIONAL AIRPORT -- A SERVICE CHARACTERIZED BY THE BROAD TERRITORIAL CONSTITUENCY SERVED, THE CONSISTENCY OF SERVICE THROUGHOUT THE YEARS AND THE PROMINENCE AND IMPORTANCE OF NORTHWEST'S SERVICE TO THE MARKETS AND AREAS CONCERNED.

We have attached to this testimony Exhibits A and B which are a tabulation, chronological listing and citation of the cities, states and areas receiving nonstop, single-plane and on-line connecting service to and from Washington National Airport on

Northwest Airlines. The prime route of service on Northwest Airlines flows generally in a northwesterly direction from Washington, D.C. Major "collecting points" for passengers to and from Washington National Airport on Northwest Airlines are Detroit, Michigan, Milwaukee, Wisconsin and the largest on Northwest Airlines' system, Minneapolis-St. Paul, Minnesota. It is most important to note that in no case does Northwest Airlines use the over-crowded hub of Chicago, Illinois as a collecting or connecting point for its passengers to and from Washington but that if Northwest were forced to reduce its services either in distance or frequency, the natural result would be to force many of our passengers to fight their way through the Chicago complex, be detained and have their trips seriously disrupted. The other alternative of forcing these passengers to use either Dulles or Baltimore airports adds at least one hour each way or two hours on a round trip to a trip already extended by basic distance from Washington and can add at least \$25.00 one-way and \$50.00 round trip to the cost of the journey.

Northwest's service at Washington National extends through Pittsburgh, Pennsylvania, and Cleveland, Ohio, where in combination we provide 50% of the total nonstop service in these markets (and where, therefore, a reduction in frequency would have a major detrimental effect on the traveling public) and to Detroit, Michigan, where Northwest provides 67% of the nonstop service to and from Washington National Airport. As a matter of fact, if single-plane

services are included, Northwest Airlines provides 75% of the service between Detroit, Michigan, and Washington National Airport.

Northwesterly from Detroit, Northwest serves Wisconsin through Milwaukee and Madison. At Milwaukee, Northwest provides the only nonstop service to and from Washington National Airport. Combining Milwaukee and Madison, primary service for the State of Wisconsin, Northwest provides 94% of the nonstop, single-plane and on-line connections to and from Washington National Airport at these cities, as shown on Exhibit A.

Next comes Minnesota, which is Northwest Airlines' home, a point of major service to Washington and the point on Northwest's system where we collect and disperse Washington National Airport traffic to all points west of Minnesota up to and including the North Pacific Coast states. At Minneapolis-St. Paul, Minnesota, Northwest provides 50% of the nonstop services and 88% of the other single-plane services. At Rochester, Minnesota, Northwest Airlines provides 100% of the single-plane and on-line connecting services to and from Washington National Airport. Combining these figures, Northwest Airlines is the provider of 73% of this service between Minnesota and Washington National Airport.

Westward from Minnesota, Northwest provides direct service to North Dakota and interline connecting service to South Dakota. In North Dakota, Northwest serves Fargo, Grand Forks and Bismarck. Seventy percent of the single-plane and on-line connecting service

between these North Dakota cities and Washington National Airport is provided by Northwest Airlines.

Next is Montana, a state of major importance to Northwest Airlines. We serve six cities in Montana -- Billings, Bozeman, Butte, Helena, Great Falls and Missoula, and we provide all of them with convenient single-plane or on-line connecting services through Minneapolis-St. Paul to and from Washington National Airport. Five out of those six cities receive at least two services each way each day to and from our nation's capital. A Billings passenger has only one stop enroute to Washington National Airport. The other cities generally have two or three stops enroute, and in only one case of all the flights listed in Exhibits A and B does a passenger to or from a Montana city have to make more than three stops. One hundred percent of the single-plane and on-line connecting service to and from Washington National Airport in Montana is provided by Northwest Airlines.

In the State of Washington, Northwest Airlines serves Spokane and Seattle-Tacoma. At Spokane, Northwest provides two convenient services to and from Washington National Airport each day. Of the four services shown on Exhibit A, three involve only one stop between Spokane and Washington National Airport and the one remaining has just two stops. At Seattle, Northwest provides single-plane, one-stop service to and from Washington National

Airport daily. In the total for the State of Washington, single-plane and on-line connections at Spokane and single-plane services at Seattle, Northwest Airlines provides 60% of the service to and from Washington National Airport.

In Oregon at Portland, Northwest Airlines provides single-plane, two-stop services to and from Washington National Airport. Of this type of service, there is only one other than Northwest's in each direction and thus Northwest's Oregon total is 50%.

All of the above are cited in order to give you a "feeling" for Northwest's commitment to the cities and states which it serves. This commitment is exemplified by the figures which show that Northwest provides in many cases all and in most cases most of the service to and from this territory. That also bears testimony to the fact that Northwest cannot reduce frequencies at Washington National Airport without seriously jeopardizing essential service to major areas and populations of our country.

Northwest Airlines' commitment and dedication are also a matter of historical record. Our pattern of service to and from Washington National Airport has remained essentially the same for many, many years as those of you who represent those areas or have utilized our services will know. We have provided the same areas and the same populations with this service in bad economic times as well as good ones, and we have not taken away any of this service in order to step out and try new markets which might well provide more traffic than those we have historically served to and

from our nation's capital.

Witness what has happened under deregulation: at Detroit, Michigan, for example, service competitive to Northwest, albeit less in volume than Northwest has historically provided and currently furnishes is now provided by a brand-new entrant in the market. The airline which formerly served this market last year and in the years past has departed from it. At Minneapolis-St. Paul, Minnesota, another airline formerly provided nonstop service to and from Washington National Airport -- that airline is no longer in the market and there are two new competitors who brought in service within this past year. Throughout this transition, as before, Northwest retained its pattern of service essentially unchanged. In North Dakota, Northwest for many years had the only single-plane and on-line connecting service to and from Washington National Airport. Within the last year, a competitive airline is providing service also. Northwest, however, has maintained essentially intact its historic pattern of service which links North Dakota with the nation's capital and even now provides 70% of this type of service. In Montana, where many expected us to leave some of the smaller cities we serve there, we have not done so (even though the Deregulation Act would have made it legally possible and others have done this in other parts of the country). We still provide our Montana cities with the same good service that is in our historic record, and

their service to and from Washington National Airport remains at the comparatively excellent level it was before deregulation.

II. WASHINGTON NATIONAL AIRPORT -- A UNIQUE AND UNRIVALED NATIONAL ASSET REQUIRING AN EQUALITY OF ACCESS FOR UNITED STATES CITIZENS.

No other air carrier airport can come close to Washington National in terms of providing convenient access to our nation's capital at a reasonable price. You have seen the statistics, and I'm sure you know the facts with regard to time, fuel and money requirements to get to and from Washington using either Dulles or Baltimore airports. The general public knows this, too. Your constituents have overwhelmingly chosen Washington National Airport when they choose their flights, buy their tickets, pay a cab, limousine or Metro fare and when they appear at Washington National Airport for transportation from the city. Short of closing down the airport altogether, and I don't think any of us view that as a reasonable solution, there is no good way to keep people from trying to use Washington National Airport -- save perhaps an army with drawn guns and bayonets surrounding it. By not letting larger aircraft such as the A300, DC-10 and L-1011 use the airport or by not letting air carrier operational slots have some increase during peak periods (or certainly by cutting them back), we could bring about the greatest, congested, free-for-all fight for each seat that the world has ever seen. A 100% load factor airport, which the proposed FAA policy seems to be pointing toward, will bring about far more congestion, turmoil, wrath

and every other unthinkable term I can imagine. We need an orderly growth program which can be planned and implemented and can bring about a reduction in noise.

Washington National Airport belongs to the people of the United States and to the extent that it can operationally handle a given number of aircraft, those aircraft should be as large as possible, within the constraints of the operational environment, as is necessary to handle the people who want the service. And again, we should not discriminate against those who have a longer air distance and who must pay more for their air fare by forcing them to have a longer ground distance and a much higher ground transportation cost for access to our nation's capital. The citizen who lives 900 miles away from Washington is not a second-class citizen as compared to the one who lives 300 miles away -- nor is his representative in Congress.

All of the statistics we have seen show that transportation from downtown Washington or the United States capital, various federal buildings, offices, hotels and the like needed for access to and from the seat of our government are in the area of one hour closer to Washington National Airport than to Dulles or Baltimore. The cab fare to Dulles or Baltimore is in the area of \$25.00. Limousine fare to Dulles, when available, is \$6.00 and one should add approximately \$2.50 for a cab to get to the limousine departure point making the total for that type of trip \$8.50. The Metro fare to Washington National is 30¢ so that on a comparative basis it costs

a minimum of \$8.00 more to go to Dulles, but a more reasonable comparison, because of schedule constraints, is a \$25.00 differential. It is most unreasonable to ask one of our citizens or his representative to pay this kind of ground transportation differential when he must already pay the higher air transportation differential caused by the distance from his home to Washington. And, as I have pointed out earlier, the only other alternative we can see to some of the FAA proposals would have the result of forcing more and more traffic through the already overly congested hubs of Chicago and Atlanta.

The Washington Metro system was built with millions of dollars of general taxpayers' money. I, a resident of St. Paul, Minnesota, just as you from wherever you reside, have contributed to that system. Should I be denied the right to use it? The only way I and millions of other people can use it is to be able to enter the Washington area through Washington National Airport. Further restriction of frequencies, prevention of widebodies or shrinking of the perimeter for service to Washington National Airport would deny us the right to use the quick, low-cost, local transportation system for which we have helped to pay.

III. THE NATURAL CONSTRAINTS ON SERVICE TO AND FROM WASHINGTON NATIONAL AIRPORT -- CONSTRAINTS WHICH ARE UNDERSTANDABLE TO ALL UNITED STATES CITIZENS.

Northwest Airlines' position on this matter is that we should not allow unnatural, strictly political restraints on the use of Washington National Airport but that we should impose constraints

which are understood to be rooted in what we term the natural constraints. Those natural constraints are primarily geographical. The airport cannot expand in physical terms, and the Potomac River, for example, determines its primary runway length. It is, and always will be for air carrier operations, a one-runway airport. There could, however, be expansion and improvement in the terminal area (if, for example, parking is the problem, consider what has been done at another relatively close-in airport -- that at Minneapolis-St. Paul, Minnesota -- where a multi-deck parking ramp has been constructed).

A one-runway airport is going to be constrained to a certain number of aircraft operations per hour. Presently, that number is 60 at Washington National Airport in IFR conditions. We and others through the ATA stress the fact that there should be an improvement in air traffic control technology which would allow this number to gradually rise. But even if the number remains at 60, then the allocation within that number should be done wisely with a view to accommodating the maximum practical number of people. Substantial preference, particularly in peak hours, should be given to aircraft which accommodate 50, 100 or 200 of our citizens and a reduction made in the number allocated to those which accommodate 1, 2 or 5 people.

The one runway which can be used by air carriers at Washington National Airport is 6,869 feet in length and that length is marginal and basically impractical for use with long-distance, high gross weight flights. Thus, there is a "natural" limit to

practical flight distance from Washington National Airport. Without imposing payload restrictions and creating gross weights which would severely increase the noise level near the airport, a 1,000-mile perimeter rule is practical, reasonable and understandable. That fact coupled with the natural restriction on the real capacity due to the one-runway condition tells us that the public in any part of the country could understand and accept a 1,000-mile perimeter rule as being fair. Northwest Airlines gives the public in Seattle, Washington, that very choice. They may fly nonstop from Dulles to Seattle or they may fly from Washington National Airport via an enroute stop to Seattle. Some choose one -- some choose the other, but I am not aware of any complaints about these patterns of service. They are logical, reasonable and fair. I would not, however, want to be forced to try to explain to a citizen in Minneapolis, Minnesota, why he cannot fly nonstop to and from Washington National Airport. He and I would both see that as unreasonable, impractical and unfair.

We see many ways by which if the Master Planning were allowed to proceed, the terminal complex at Washington could be improved to accommodate more persons, the parking area increased (perhaps by going skyward), roadways improved and, most important, more than the 15% currently using the Metro would be encouraged to do so. The air carriers have paid their fair share for use of Washington National Airport, and I am sure can agree to pay for rental and use of new and improved facilities, provided the "developmental cloud" is

taken off of the airport and a policy of reasonable growth to accommodate traffic demand is established. All of this, in our view, is far superior to the madness and congestion which would be caused by the "fight for every seat", 100% load factor situation which would result from the DOT-FAA proposal.

IV. THE IMPORTANCE OF RELATIVELY DISTANT, NON-CONGESTED HUBS -- SUCH AS MINNEAPOLIS-ST. PAUL, MINNESOTA -- IN PROVIDING GOOD ACCESS TO AND FROM WASHINGTON NATIONAL AIRPORT.

On Northwest Airlines, the best example of using a non-congested hub for gathering and dispersing traffic to and from Washington National Airport is the way in which we use Minneapolis-St. Paul, Minnesota. To a lesser degree, but still important, is the similar use we make of Milwaukee, Wisconsin, and Detroit, Michigan. But Minneapolis-St. Paul provides the best example of why this is so important. The geography of the situation is such that if we did not make use of the Twin Cities in this way virtually all the traffic that now uses this hub would be forced through Chicago which is already over-crowded and does not really need nor want this traffic, at least at O'Hare Airport, which is the major connecting point. Such a situation would not only increase congestion and delay everyone's trip but also make it inconvenient, causing long walks, hot tempers and lost baggage. From cities in the southeastern part of the United States, I am sure that the alternative to a 1,000-mile perimeter, which we believe is practical as previously expressed, would be forcing that traffic through the Atlanta hub which is also congested and does not need nor should it have imposed

upon it traffic which now does fly nonstop to and from Washington National Airport. Cities within a thousand miles of Washington National (the constraint being largely operational), where their own local traffic or traffic they can collect as a hub from surrounding and more distant points can support nonstop flights to Washington, should have them. This not only provides better service to the public but it also relieves Chicago and Atlanta.

We have already addressed the other alternative, i.e., Dulles and/or Baltimore. People accept and use services there when it is more convenient for them (if they happen to be or live nearby) or when there is an operational reason that a long-distance flight cannot use the relatively short runway at Washington National Airport. People don't accept these alternatives (costly as they are in time and dollars) when there isn't a reasonable operational restriction and when in their view a purely arbitrary restriction has been imposed. Moreover, we in Northwest Airlines have had experience in trying to serve Washington from the medium-range distances through Baltimore and Dulles. Many years ago, we tried to serve Detroit and Pittsburgh through Baltimore and had to give it up for lack of traffic support. In the early 1960's, when Dulles opened, we scheduled a pure jet Boeing 720B between Dulles on the one hand and Detroit and Minneapolis-St. Paul on the other. That service could not compete with the propeller-driven services at Washington National Airport. It died a horrible death for lack of public support.

I am vividly aware of this because as a Company employee traveling on non-revenue, space available transportation I knew that to be assured of a seat we went to Dulles while the paying passengers, the general public, invariably chose the flights at Washington National. That one flight at Dulles, in addition to the non-revenues, had on board a few people who lived nearby plus the overflow from Washington National, people who were very upset because they had gone to Washington National, tried to get a seat and wound up taking the long bus ride to Dulles.

V. THE NOISE ISSUE -- NORTHWEST AIRLINES' RECORD IN NOISE ABATEMENT AND THE QUIETER AIRCRAFT AVAILABLE TO SERVE WASHINGTON NATIONAL AIRPORT.

In other proceedings before this Committee as well as in other forums, we have described the progress of Northwest Airlines in abating noise through the purchase and use of newer, quieter aircraft and through our pioneering of noise abatement operational techniques. I need only cite briefly three basic issues on this subject.

Northwest still knows best how to produce the least noise impact in a comparable flight by the same type of aircraft -- and Northwest's pilots have been trained to and do observe the specialized techniques which result in lower noise levels. The FAA publishes monthly or bimonthly its "Aircraft Noise Monitoring Report" for Washington National Airport and Dulles International Airport. This report relies on data from fixed monitors which measure the intensity and duration of noise at several sites surrounding each airport,

identifying each with the airline and type of equipment. The first of these reports covered the month of October, 1978. At that time, Northwest's 727 flights at Rosslyn, for example, were quieter than anyone else's and the duration of the noise from Northwest flights was about half that of the average air carrier 727 flight. We were cited as producing "half the noise for half the duration" compared to the noisiest airline operation. Since then, other airlines have modified their procedures to be more like those of Northwest, and the decibels of noise at the same site have been reduced to volumes close to Northwest, although Northwest still remains, as always, one of the very quietest. However, Northwest still maintains the enviable record of having the duration of the noise from its aircraft to which the public is exposed be much less than anyone else's. Again, In January, 1980, the average duration of Northwest's 727 flights at the peak noise level over Rosslyn was 17.2 seconds compared to all other airline 727 aircraft which averaged from a low of 26.1 seconds to 35.5 seconds. While the noise level was closer to but not up to the average of the others, the duration of the noise exposure from Northwest's flights was still close to half that of the others. This results from an operating technique which stresses early flap retraction, thus an aerodynamically "clean" aircraft, greater precomputed thrust reduction and because of altitude and aerodynamic cleanliness the greatest speed for the lowest

relative thrust. This higher speed at relatively low thrust means not only less noise duration but, of course, less fuel consumption as well. Our point here is to stress the fact that there are still ways of operating aircraft with less noise, albeit the major advances on current type aircraft have been made.

There are still ways to improve the noise condition around close-in airports. I hope you will hear testimony from the representative of the Minneapolis-St. Paul International Airport. That is an airport which like Washington National is relatively "close in" and close to residential areas. Through cooperation between the Minneapolis-St. Paul Metropolitan Airports Commission, the airlines serving Minneapolis-St. Paul, the FAA and designated citizens of the areas surrounding the airport, a coordinated effort has been made and continues to be made to explore and implement all possible ways of reducing noise around the airport. The Minneapolis-St. Paul record is exemplary in our opinion, and we are proud to be a part of it. An effort of this type at Washington could produce some of those benefits.

All of the data you have been given indicates that allowing two- and three-engine widebodies to serve Washington National Airport will reduce the noise exposure there. These new widebodies are quieter at the source, certificated to meet or better FAR 36 requirements and with, for example, a 1,000-mile perimeter restriction will be operating at relatively light gross weights which result in noise levels substantially less than those at the FAR 36 certification

conditions. Retrofit of some of the existing two- and three-engine narrow-bodies as we and others are doing will result in some noise reduction also, but this will not be as dramatic as that which can result from the introduction of widebodies.

VI. WIDEBODIES -- WHY THEY'RE NEEDED AND HOW NORTHWEST WOULD PUT THEM IN SERVICE AT WASHINGTON NATIONAL AIRPORT SAFELY AND EFFICIENTLY.

Two- and three-engine widebodies are the only means in our opinion to accommodate the United States citizens who demand and we believe have a right to use Washington National Airport, and as stated previously, their use will mean less noise on a comparable basis than the narrow-bodies they replace. If we do not allow widebodies into Washington National Airport, the pandemonium of the "fight for every seat", 100% load factor situation is bound to occur, and we cannot consider substituting them 1 for 2 or 2 for 3 or in some other formula approach because we believe that every frequency that we operate is a necessary frequency to allow either minimum service to the community we serve or, at the closer-in cities, the ability to make a round trip during the day to accommodate one-day or shorter trips to visit constituents, conduct governmental or private business, etc. The public has shown that they need and use these frequencies. Widebodies are needed on a few of them now and will be on more as traffic continues to grow. That is the only way to accommodate public demand at a constrained airport. A

fancy formula approach makes no sense in our situation. Most often, we hear "1 for 2". I hope I need only point out that one of our DC-10's has fewer seats in it than two of our 727-200's, but even more important is the requirement for frequency and choice of departure and arrival times that has been demonstrated by the public and the need to accommodate natural traffic growth at an airport where there is a practical operational limit to the number of frequencies. That limit has not yet really been reached for air carrier operations, and we should not relax the pressure to improve our air traffic control system.

You have heard testimony about the "deficiencies" at Washington National Airport and possible hazards to the safe and efficient use of widebody aircraft there. Northwest would not propose to use widebodies (in our case specifically the DC-10) at any airport unless we knew we could conduct a safe and efficient operation with them. Our record on this subject is clear: the same type of concerns were raised with regard to jet operations at the Montana airports we serve, particularly those at Bozeman, Butte, Helena and Missoula. Before we would schedule jet aircraft into those airports, we first satisfied ourselves that the navigational aids, runway conditions and other physical facilities were adequate and appropriate (in some cases we even participated in the purchase and installation of navigational equipment). We then sent a crew of supervisory pilots headed by Captain Paul Soderlind, Director of

Flight Operations-Technical, (of whom many of you have heard) with a jet aircraft to actually fly all of the approach and departure patterns and land and takeoff and taxi and park on the airport, simulating all conceivable conditions, and from that experience to develop precise procedures which were then put into our operating manuals and taught to all our line pilot crews for operation into and out of those "difficult" airports. In many ways, because of mountainous terrain and high altitudes and a relative lack of sophisticated navigational equipment, those airports presented far more problems for a 727 than Washington National Airport would for a DC-10. Nevertheless, Northwest would use this same type of procedure to satisfy itself, to write procedures and teach its pilots on the methods for handling a DC-10 in the Washington National environment. This would be done under the direction of Captain Jerrol T. Fredrickson, our current Director of Flying Operations.

VII. WHAT NORTHWEST AIRLINES NEEDS IN THE FORM OF GOVERNMENT POLICY AND WITHIN THE NATURAL CONSTRAINTS OF WASHINGTON NATIONAL AIRPORT TO CONTINUE ITS PATTERN AND RECORD OF SERVICE IN A GROWING MARKET.

To accomplish our objectives which we believe to be the objectives of the traveling public, equal citizens of the United States of America, we need your support in the following issues of policy concerning the future of Washington National Airport.

1. Two- and three-engine widebody aircraft should be permitted to operate there.

2. There should be a "natural" perimeter on nonstop operations to and from Washington National Airport including those cities which now receive nonstop service -- 1,000 miles is suggested.

3. A higher priority should be given to air carrier and commuter aircraft which serve larger numbers of the general public as compared to private aircraft using valuable operational slots for a small number of persons per operation.

4. There should be more flexibility in allocation of peak hour slots to air carriers, where the public demand for service lies, such as is incorporated in our ATA proposal. If the 1-, 2- or 5-passenger aircraft insists on using Washington National Airport, it should be given the choice of the non-prime time hours or the use of another airport rather than forcing the commuter or air carrier aircraft with its, 50, 100 or 200 passengers out of prime time or away from the desired convenient and economical destination.

5. Operating times should recognize time zone constraints across our country (as an example, the two-stop service from Portland, Oregon, and the one-stop service from Seattle-Tacoma, Washington, arriving in Washington at 9:07 p.m. require departures from Portland at 11:10 a.m. and Seattle at 12:25 p.m. and a passenger in Missoula, Montana, must leave there at 10:28 a.m. in order to arrive in Washington at 8:11 p.m. -- these should not be pushed earlier). On this subject, the ATA proposal with

flexible slot allocations and a reduction in the operating hours is a reasonable compromise between the present situation and the FAA proposal and does result in a substantial reduction in noise during nighttime hours, particularly those during which people may be expected to be trying to sleep.

6. Institute and carry out with the cooperation of all concerned a noise abatement program which is innovative, takes maximum possible advantage of FAR 36 technology, experiments with new flight tracks and makes use of whatever reasonable and productive noise abatement measures that have been successful in other parts of the country.

We appreciate your attention to Northwest Airlines' concerns about serving the public at Washington National Airport while still recognizing the need to make that airport as good a neighbor as is reasonably possible. We will be please to explore these issues in greater depth at your request.

* * * * *

Attachments

June 20, 1980
Exhibit A

BOATWRIGHT AIRLINES, INC.
SERVICE TO WASHINGTON NATIONAL AIRPORT
EFFECTIVE JUNE 19, 1980

[illegible]

*Note: Budget following B (single place) or C (concessions ex-lease) is total number of steps current to DCL.

[illegible]

*Note: Number following S (single-plane) or C (connections-on-line) is total number of steps executed from DCA.

Official Aviles Guide - June 1980

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BEFORE
THE SUBCOMMITTEE ON AVIATION
COMMITTEE ON
PUBLIC WORKS & TRANSPORTATION
JUNE 12, 1980

* * * * *

TESTIMONY OF
CAPTAIN THOMAS BUTTION
SENIOR VICE PRESIDENT - FLIGHT OPERATIONS
EASTERN AIR LINES, INC.

Eastern Airlines supports the position of the Air Transport Association on the issue of access to Washington National Airport.

We fully understand the concerns of the communities surrounding National Airport about aircraft noise, and we fully support measures to reduce community noise exposure so long as they properly address the needs of all our citizens, including those of other communities who rely on service to National Airport for access to our Nation's Capitol.

Let me briefly put this issue into perspective.

First, I don't believe there is any argument that National Airport has a unique position among the three area airports. For those destined to the Capitol, it has unequalled ease of access. Now, with the opening of the Metro, there really is no access problem. Clearly, when you arbitrarily force people to Dulles or Baltimore-Washington, you are imposing on them a significant penalty--both in time and cost.

Second, among the major airports of this country, National Airport already most severely restricts air carrier operations for environmental reasons. Not only is National Airport unique in its 10 p.m.-7 a.m. curfew, but certificated air carriers are allowed to use only two-thirds of the available take-off and landing "slots," 40 of 60. By way of contrast, at LaGuardia Airport in New York, which is directly comparable to National Airport, there is no 10 p.m. curfew, and 48 of 60 slots are allocated to certificated air carriers.

Third, the noise problem at National Airport is not getting worse. In fact, with enlightened public policy the situation will improve. Under current rules, there can be no increase in aircraft noise. In fact, there has been none for several years. As aircraft are modified to comply with FAR 36, measured community noise exposure should decrease. If there is any increase in noise exposure, it would be as a result of increased General Aviation operations, which under VFR conditions are essentially unrestricted.

Nevertheless, it clearly is desirable to reduce the noise impact of our operations in a way which does not penalize the traveling public. There are two ways to do so.

The first is to redistribute our operations. In terms of the real effect on the surrounding communities, flights in the early morning hours, late at night and on weekends obviously have the greatest impact. The ATA proposal, which limits operations at these noise-sensitive hours while retaining the carriers' ability to meet the travel demands of the public, is in our view a far more balanced and constructive approach to the problem than the across-the-board reductions proposed by the FAA.

The second is to take advantage of technology. There is no question that wide-body aircraft and other advanced technology aircraft using high-bypass-ratio engines make far less noise than aircraft operating at National Airport today. In the process, they also can provide needed increases in seating capacity to accommodate air travel demand.

Nevertheless, until now the FAA has prohibited wide-body operations at National Airport. To our knowledge, it is the only airport in the country where there is a demonstrated need for wide-body aircraft, where the airport is physically capable of accommodating the aircraft, but where the airport operator arbitrarily prohibits its operation.

We are gratified that the FAA finally has recognized the desirability of permitting wide-body operations at National Airport. As the noise data which we have attached for your information--including actual readings at the airport--clearly demonstrate, the local community will be the beneficiary.

Let me directly address one issue--that of the feasibility of wide-body operations and, specifically in Eastern's case, the A300.

I can assure you that Eastern would not advocate the introduction of the A300 unless we were absolutely convinced that it was operationally feasible. As a pilot, I would find any compromising of basic operational requirements unacceptable.

Eastern has now operated the A300 for two and one half years. We have extensively analyzed the performance of the aircraft as it relates to operations at National Airport. Two years ago, on April 12 and June 20, 1978, we actually demonstrated and tested the A300 at the airport.

The results demonstrate that A300 operations at National Airport are as acceptable as those of the jet aircraft already serving the

airport. As the material attached to this testimony shows, both runway length and obstacle clearance exceed basic requirements by a comfortable margin. Moreover, during our test operations our pilots found the A300 to be fully as capable as the B-727 of executing the final turn required when landing to the south, on Runway 18. We operated out of our existing Gate 23 with no problem.

Thus, there simply are no operational reasons for continuing to prohibit wide-body operations. Absent that, responsible public policy should not only permit wide-bodies, but should encourage them.

We feel particularly strongly about this question because the real answer to the environmental issue is not arbitrary restrictions on airport operations, which place an undue burden on the air traveler. Instead, it is to capitalize on technology. Wide-Body aircraft already in our fleet, as well as new aircraft soon to be introduced into service, such as the B-757 and B-767, will let us accommodate more passengers while consuming less fuel and reducing community noise exposure. And nowhere is that more beneficial than at National Airport.

4/12/78

FEDERAL AVIATION ADMINISTRATION

WASHINGTON NATIONAL AIRPORT
A-300 AIRBUS DEMONSTRATION

April 12, 1978

SUMMARY NOISE DATA A-WEIGHTED SOUND LEVEL (dB)

Depart DCA at 10:42 : Noise Reading 96 dB				Arrive DCA at 11:05 : Noise Reading 93 dB			
CARRIER	A/C TYPE	TIME	N1 ROSSLYN	N2 GEORGETOWN	S1 OLD TOWN	S2 FORT FOOTE	
UAL	ARR	7:36	79	75			
EAL	ARR	7:39	68	75			
EAL	ARR	7:41	76	79			
EAL	ARR	8:15	77	73			
EAL	DPT	10:32	82	77			
AA	DPT	10:33	85	84			
UAL	DPT	10:36	81	76			
AA	DPT	10:38	82	82			
AA	DPT	10:40	86	82			
EAL	DPT	10:45	77	77		72	
EAL	ARR	10:54				71	
EAL	ARR	10:56				79	
UAL	ARR	11:00					
EAL	ARR	11:03			74	78	
NW	ARR	10:44			78	81	
AA	ARR	10:42			78	78	
UA	DPT	11:46	86	86			
EAL	DPT	11:42	89 *	87 *			
EAL	DPT	11:57	79	76			

* Means 1/2 the noise

Noise Footprint Comparison

(90 EPNdB Contours)

13.5 square miles



Silenced 1960's Trijet

7.6 square miles

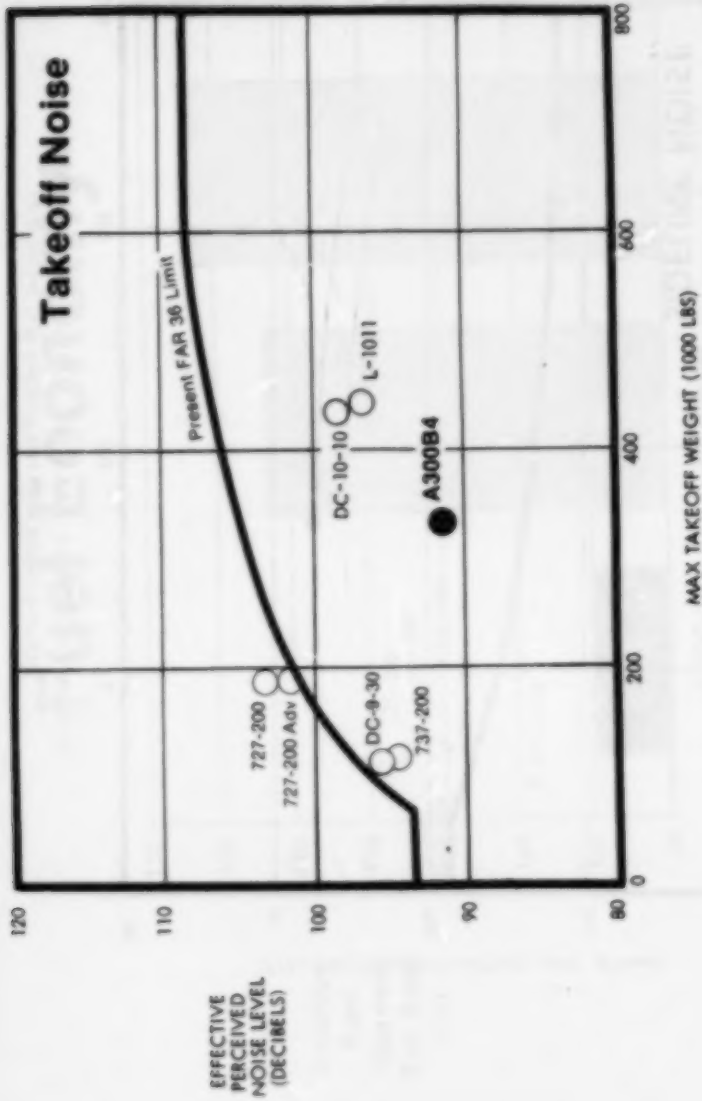


Wide Body Trijet

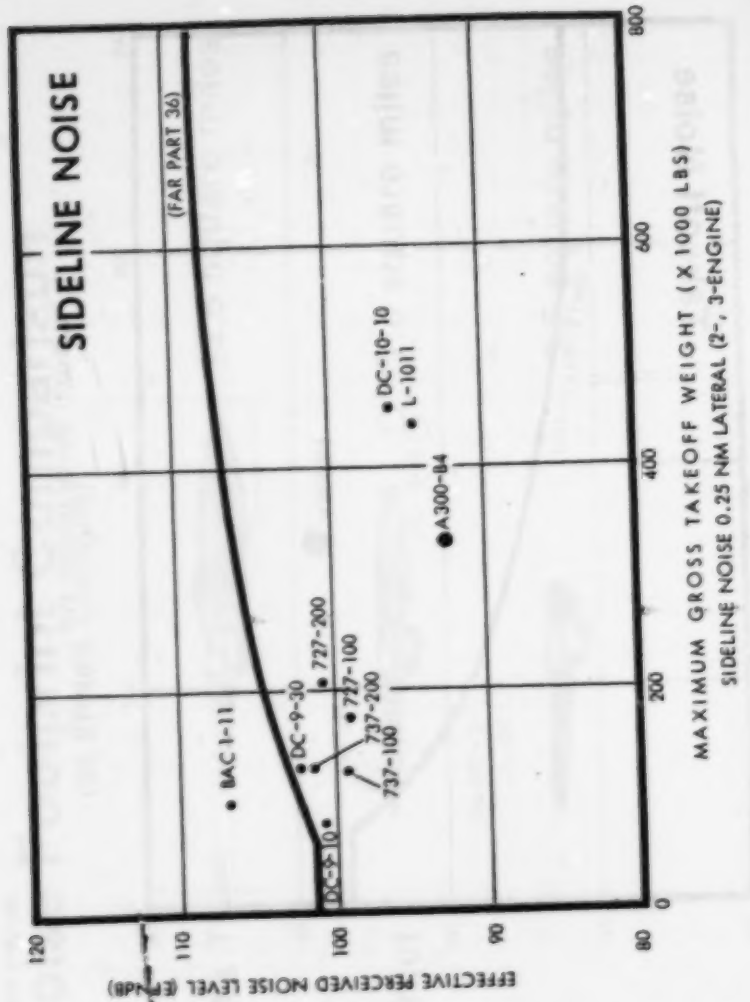
3.5 square miles



A300

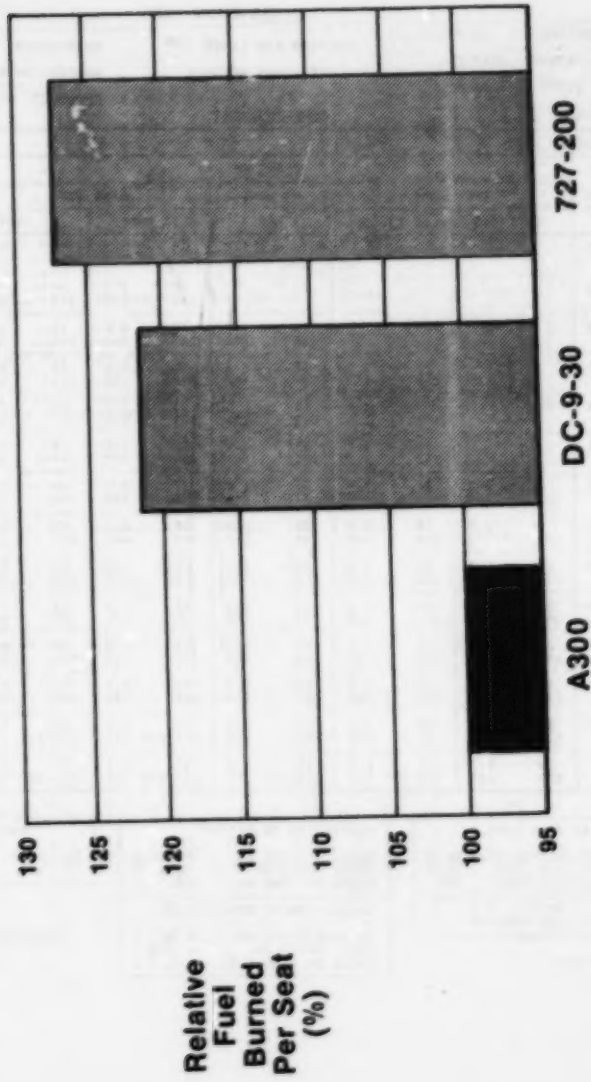


Source: Airbus Industrie



Fuel Economy

591



DCA

ELEVATION 15 FT
R/W LENGTH 6869 FT
R/W SLOPE 0.01 X

A300
EASTERN AIR LINES
TAKOFF GROSS WEIGHTS

WASHINGTON, DC
WASHINGTON NATL
CF6-50C2 NO ENGINE BLEED

RUNWAY 36

DRY RUNWAY

SPECIAL INFO:												
WGT 1000 LBS	FLAPS 8											
	TAIL WIND				NO WIND				HEAD WIND			
	10 KNOTS		5 KNOTS		0 KNOTS		10 KNOTS		20 KNOTS		V 3	V 4
355									2 154	0.0 157	168	211
350							5 150	0.0 153	25 149	0.1 153	167	210
345					6 146	0.0 149	28 145	0.1 149	30 148	4.0 152	166	208
340			-7 145	0.3 147	22 144	0.1 147	30 145	4.4 149	33 147	0.4 151	165	207
335			5 143	0.5 146	30 142	1.6 146	33 144	1.2 148	34 147	2.6 151	164	205
330			16 142	0.2 145	33 141	0.4 145	35 144	0.6 147	36 146	1.9 150	163	204
325	-5 141	0.2 144	26 140	0.4 144	35 141	1.2 144	37 143	0.0 147	38 146	1.2 150	162	203
320	5 140	0.5 143	30 140	3.4 143	37 140	0.6 143	38 143	2.2 146	40 146	0.6 149	160	201
310	27 137	0.2 140	36 138	1.7 141	40 140	2.4 143	42 142	1.5 145	43 145	2.6 148	158	198
300	30 136	0.8 140	42 136	0.4 138	44 139	2.2 142	46 142	1.4 144	48 144	0.1 147	156	195
290	39 133	1.4 136	46 135	1.8 137	49 138	0.3 140	50 141	1.8 143	52 143	0.7 146	153	192
280	45 131	0.2 133	51 133	0.2 135	53 137	1.3 139	55 140	0.6 142	55 143	4.1 145	150	188
270	50 130	1.0 131	55 132	1.4 133	55 136	6.9 138	55 118-130	0.0 132	55 113-129	0.0 132	148	185
260	55 127	1.7 129	55 119-127	0.0 129	55 111-126	0.0 129	55 107-126	0.0 129	55 107-125	0.0 129	146	181

FLEX TEMP LIMITS:

NOT GREATER THAN 50 C
NOT LESS THAN 30 C
NOT LESS THAN OAT

VR = V2 - 2
NOT LESS THAN V1

CORRECTION TO WEIGHT:

NACELLE A/ICE ON -8800 LB
TOTAL A/ICE ON -13200 LB
PACKS ON (ENG BLD) -8800 LB

CORRECTION TO TEMPERATURE:

NACELLE A/ICE ON -4 DEG C
TOTAL A/ICE ON -6 DEG C
PACKS ON (ENG BLD) -4 DEG C

DATA CODE

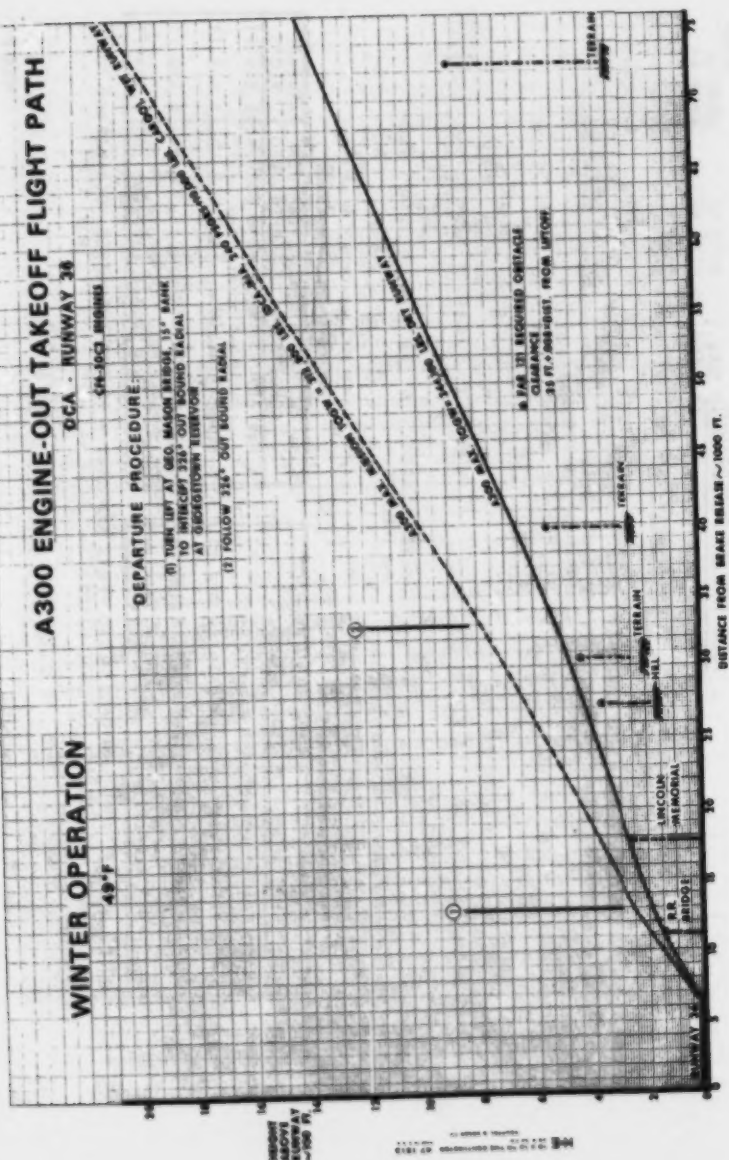
MAX TEMP WEIGHT INCR
V1 (IAS) V2 (IAS)

ISSUE DATE: 5/ 5/80

PAGE 5 OF 5

WET RUNWAY

KDCB		RWY 36		ELEVATION		15. FT+FLAPSW	
A300B4 CF6-50C2		GRAD1: 340 GRAD2: 0 K2=0.0		RUNWAY+STW		6869. FT+ TGA	
WEIGHT:		1000LB		SLOPE (%)		0.01 : F8	
-10		-5		0		10	
355.0		350.0		345.0		340.0	
335.0		330.0		325.0		320.0	
310.0		300.0		290.0		280.0	
270.0		260.0		250.0		240.0	
230.0		220.0		210.0		200.0	
190.0		180.0		170.0		160.0	
150.0		140.0		130.0		120.0	
110.0		100.0		90.0		80.0	
70.0		60.0		50.0		40.0	
30.0		20.0		10.0		0.0	
-10.0		-20.0		-30.0		-40.0	
-50.0		-60.0		-70.0		-80.0	
-90.0		-100.0		-110.0		-120.0	
-130.0		-140.0		-150.0		-160.0	
-170.0		-180.0		-190.0		-200.0	
-210.0		-220.0		-230.0		-240.0	
-250.0		-260.0		-270.0		-280.0	
-290.0		-300.0		-310.0		-320.0	
-330.0		-340.0		-350.0		-360.0	
-370.0		-380.0		-390.0		-400.0	
-410.0		-420.0		-430.0		-440.0	
-450.0		-460.0		-470.0		-480.0	
-490.0		-500.0		-510.0		-520.0	
-530.0		-540.0		-550.0		-560.0	
-570.0		-580.0		-590.0		-600.0	
-610.0		-620.0		-630.0		-640.0	
-650.0		-660.0		-670.0		-680.0	
-690.0		-700.0		-710.0		-720.0	
-730.0		-740.0		-750.0		-760.0	
-770.0		-780.0		-790.0		-800.0	
-810.0		-820.0		-830.0		-840.0	
-850.0		-860.0		-870.0		-880.0	
-890.0		-900.0		-910.0		-920.0	
-930.0		-940.0		-950.0		-960.0	
-970.0		-980.0		-990.0		-1000.0	



A300 TAKEOFF PERFORMANCEDCA RUNWAY 36

RUNWAY LENGTH - 6869 FEET

CFG-50C2 ENGINES
NO REVERSE THRUST
SLATS/FLAPS - 16°/8°WINTER

49°F (9°C)

0	1	2	3	4	5	6	7
							A
							C D B

0	1	2	3	4	5	6	7
							A
							C D B

SUMMER

87°F (30°C)

CONDITION	TAKEOFF GROSS WT.	RUNWAY REQ'D
A FAR DRY-MAX. ALLOW	344,100 LBS	6,869 FT.
B WET-MAX. ALLOW	322,900 LBS	6,869 FT.
C DRY-NOR. REQUIRED	312,800 LBS	5,350 FT.
D WET-NOR. REQUIRED	312,800 LBS	6,400 FT.

CONDITION	TAKEOFF GROSS WT.	RUNWAY REQ'D
A FAR DRY-MAX. ALLOW	336,600 LBS	6,869 FT.
B WET-MAX. ALLOW	313,800 LBS	6,869 FT.
C DRY-NOR. REQUIRED	308,800 LBS	5,580 FT.
D WET-NOR. REQUIRED	308,800 LBS	6,700 FT.

NOTE: NORMAL REQUIRED TOGW - 240 PSGRS AND BAGS + 10,000 LBS CARGO, DCA-MIA
(85% PROBABILITY ENROUTE WINDS)

LANDING PERFORMANCE

DC-9-31

MAX. LANDING WT. - 98,100 LBS.
FLAPS 30°

0	1	2	3	4	5	6	7
A							
B C D							

A ACTUAL DRY = 2778 FT.
 B ACTUAL WET = 4390 FT.
 C FAR DRY = 4830 FT.
 D FAR WET = 5325 FT.

RUNWAY 18
LENGTH 8965 FT.MAX. LANDING WT. - 150,000 LBS.
FLAPS 30°

0	1	2	3	4	5	6	7
A							
B C D							

A ACTUAL DRY = 3054 FT.
 B ACTUAL WET = 4982 FT.
 C FAR DRY = 5090 FT.
 D FAR WET = 5730 FT.

B727-225A

MAX. LANDING WT. - 184,500 LBS.
FLAPS 30°

0	1	2	3	4	5	6	7
A							
B C D							

A ACTUAL DRY = 3126 FT.
 B ACTUAL WET = 5086 FT.
 C FAR DRY = 5210 FT.
 D FAR WET = 5860 FT.

A300

MAX. LANDING WT. - 295,410 LBS. (A300B4)
MAX. LANDING WT. - 286,900 LBS. (A300B2K)

FLAPS/SLATS 25°/25°

0	1	2	3	4	5	6	7
(A300B4)							
(A300B2K)							
A B C D							
A B C D							

A ACTUAL DRY = 3132 FT.
 B ACTUAL WET = 4807 FT.
 C FAR DRY = 5220 FT.
 D FAR WET = 6003 FT.

MIAEP

REV. 05/15/80

STATEMENT
OF
IRVING T. TAGUE
CHAIRMAN, MIDWAY AIRLINES, INC.
ON PROPOSED RESTRICTIONS
ON ACCESS TO WASHINGTON NATIONAL AIRPORT
BEFORE THE AVIATION SUBCOMMITTEE
OF THE HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

JUNE 19, 1980

I would like to express my gratitude to the Committee for the opportunity to appear here today.

As you may know, Midway Airlines is the newest and smallest of the regional carriers certificated by the Civil Aeronautics Board. Just last October we began operating low priced, high frequency services with Douglas DC-9 fan jet aircraft out of Midway Airport, Chicago. Our initial route pattern included Kansas City, Detroit and Cleveland. A month ago we added services to and from St. Louis, and on June 1 we started service to Washington National.

We operate four frequencies in each direction out of Washington National and our standard one-way coach fare is \$85.00 -- \$40 less than the coach fare of our competitors. We were also the low bidder for government traffic and were recently awarded a contract by GSA to carry government personnel between Washington, D. C. and Chicago. We estimate that use of our services by government personnel could result in U.S. Government savings just for air transportation of as much as \$2 million annually; in addition, reduced transit time and ground transportation costs because of Midway's proximity to downtown Chicago and most U.S. Government offices will increase those savings. The U.S. Government, therefore, has an economic stake in the continuity of Midway Airlines' services in the Chicago-Washington market.

The future of Midway's Chicago-Washington services is tied to the terms under which air carriers are afforded access to National. Were those terms to preclude Midway from effectively serving National while our O'Hare-based competitors were able to do so, we would be foreclosed from the market. We simply do not believe that a Midway-Dulles service would be viable.

It is in that context that we have approached the FAA's proposal to place new and more restrictive constraints on access to National for the stated objective of diverting service to Washington's other airports.

I would be less than candid were I not to recognize at the outset that the airport proprietor, whoever he may be, has a constituency larger than just the air carriers which provide the reason for the airport's existence. And further, it is clearly in the air carriers' interest to be a good neighbor and to work with the airport proprietor in controlling, distributing, and reducing noise impact on the communities surrounding the airport. However, we must be sure that the manner in which the airport proprietor seeks to resolve these potentially competing interests actually serves transportation and environmental objectives. This we do not believe the FAA's current proposals do.

Thus, it is our concern that, if implemented as proposed, the FAA's proposals, when viewed in their entirety, are likely to be perceived as having exacerbated noise impact on the environs of National Airport, eliminated access for socially useful, existing air services, and inhibited, if not precluded, new carriers from developing innovative, low-fare express services for Washington traffic.

The proposal which is the direct subject of this proceeding involves essentially a trade-off for the air carriers of reduced flight hours and aircraft operations for access to the city's most convenient airport in larger aircraft. The FAA believes that the air carriers will be able to serve more passengers at National with reduced frequencies by substituting larger capacity aircraft. The premise apparently is that the airport's neighbors will appreciate the less frequent intrusion of airport noise. Unfortunately, this is not the simple and equitable solution that it appears to be.

In the first place, it must be recognized that the noise impact from the wide-bodied jets will in many cases be significantly greater than that of the aircraft which they replace. Simply put, a fully loaded FAR-36 wide-bodied, three engine jet can create substantially more noise than comparably loaded narrow-bodied equipment which meets FAR-36 thresholds. It is questionable to me whether the communities will accept as a public good the concept of more noise per

movement in exchange for slightly fewer movements and a curtailment of airport operating hours. Certainly, the public must at the outset be made fully aware of the trade-off or one can be certain that the repercussions will be serious and effective.

But even were public acceptance foreordained, there is no sound reason why access policies should be tilted toward maximizing wide-bodied operations and thus exacerbating noise impact. In the first place, it is plain that opening National to two and three engine, wide-bodied jets will encourage use of the airport for long-haul services. I have already noticed a trend toward carriers promoting long-haul transcontinental services out of National. Western, to cite only one example, is actively promoting its 6:05 departure from National to Los Angeles via a stop in Minneapolis. While that flight arrives in Los Angeles approximately 90 minutes later than a comparable non-stop flight from Dulles, the businessman using National is able to complete a normal work day in Washington before departing for the airport. If such a service is attractive using B-727 aircraft, it will be even more attractive in wide-bodied equipment. And it is plain that opening National to wide-bodied aircraft will greatly encourage such long-haul services. The effect could be to divert traffic from Dulles rather than to it, and increasing the perimeter radius from 650 to 1,000 miles would accelerate this diversion.

A shift to the use of wide-bodied aircraft at National could, therefore, both intensify noise problems and impede efforts to transfer long-haul services to Dulles. Coupling use of wide-bodied aircraft with a bidding system for a landing or takeoff slot, as is now being contemplated by the FAA, would drive low-priced express services such as Midway's from the market.

An operator of a DC-10 aircraft with 270 seats can afford to bid, on a per operation basis, much more than the operator of a 83-seat DC-9. And because it would be economically impractical and operationally impossible to operate with DC-10 type equipment on the Midway-Washington route, Midway could bid successfully for access only by raising its prices to a point that it loses its identity as the low-price alternative or limiting its services to less expensive off-peak hours. In either case the ultimate result would be the same -- Midway or any other new carrier attempting to develop low fare, express type passenger service would be forced out. I can assure you that the public neither wants nor needs an additional Washington-Chicago carrier charging rates comparable to those of the established trunklines. And the business traveller, be he a government or private industry employee, cannot effectively utilize a service which is not timed to his travel requirements. An \$80 round-trip savings on air fare is more than offset

if services at that fare are so timed as to require the average traveller to stay overnight at his business destination in order to use Midway.

Other witnesses will comment in detail on the various aspects of the FAA proposal with suggestions for modification to increase air carrier access to National Airport. Many of their proposals, if adopted, would serve Midway's interest and therefore merit our support. On the other hand, we have some ideas which may be unique but which, nonetheless, we believe are worth calling to your attention.

In the first place, we believe that the FAA should be more candid about the environmental motivation for the rule rather than treat such motivation as a byproduct of a traffic distribution program for the allocation of traffic among the Washington area airports. In so doing the FAA would be forced to consider whether the units to be allocated should be arrival and departure slots per se or some form of aircraft noise unit. If the allocated units relate directly to noise impact with the current noise impact as the ceiling, there would be considerably less risk that the populace in the Washington National approach area would, after the program has been put into effect, feel that they had somehow been taken in.

Second, we wholeheartedly agree with the FAA's view that National Airport access policy must take into account policies of the Airline Deregulation Act. However, the FAA must take into account the Act in its entirety. It cannot limit its focus to just those aspects related to the strengthening of commuter air carriers. The Act establishes as public policy the encouragement of air services at satellite airports such as Chicago's Midway by ". . . fostering an environment which reasonably enables . . . [carriers whose exclusive responsibility it is to serve such airports] . . . to establish themselves and to develop their secondary or satellite services." Section 102(2)(6), Federal Aviation Act of 1958, as amended, 49 U.S.C. 1302(a).

As this Committee is well aware, the Congress and at least two Administrations sought for years to have Midway Airport reactivated. But until Midway Airlines started service, Midway Airport was practically deserted and at risk of being closed and the property disposed of for a commercial real estate development. Midway Airlines must be able to operate successfully in markets such as Washington-Chicago to be assured of financial success -- and the future of Midway Airport rides on our performance. An airport access policy for Washington National, which fails to foster an environment that reasonably enables carriers such as

Midway to continue Washington National services, would be as inconsistent with the will of Congress as would be a policy which required commuter carriers to vie with wide-bodied jets for access to the facility.

The FAA is clearly interested in developing an auction system to allocate slots at National. In my judgment, it is appropriate for that agency to develop an alternative to the current airline committee system for dividing a limited number of access slots among prospective users. The committee system is fraught with difficulties and could break down at any point. To be caught without an alternative method for use in such an event would be folly. But any allocation system, as I previously noted, must be such as to assure that National remains as the primary airport for small community and small commercial jet aircraft service with Dulles playing a growing role for medium- and long-haul services and the larger aircraft. Further, we believe that National must not be closed to prospective new entrants or to carriers proposing innovative services.

I want to emphasize, however, that I am not recommending abandonment of the committee system in favor of an auction or any other untested form of allocation while the existing arrangement still functions and satisfies the objectives to which I have just referred. To my constant amazement, the committee system has worked so far. Midway and Air Florida,

for example, have introduced an array of new low-fare services at National under the committee arrangement and every other would-be new entrant has been accommodated. I have heard of no carrier arguing that they have been unfairly treated or that the system must be replaced. Under these circumstances I am puzzled by what seems to be a hell-bent approach to terminate the current allocation system and replace it with an untested FAA-administered system of one sort or another.

Assuming, however, that some form of auction system is ultimately adopted to distribute slots at National, there remains an open question as to what use to make of the proceeds.

In the Polinomics Study, jointly commissioned by the CAB and the FAA, it was properly assumed that a market system would function best if the proceeds from a slot auction were to be used to increase airport capacity. To do otherwise would to assure airport proprietors of monopoly rents as access rights became an increasingly scarce commodity through normal traffic growth or the proprietor's interest in developing a cash cow. In cases such as Washington National, there may be no practical way to increase capacity. It is possible, however, to relieve demand on National by increasing the attractiveness of Dulles. One way this could be done

would be by dedicating the median strip on the Dulles access road to a rapid transit system link with the local subway system with the financing of such system to be aided by the airport access fees earned at National. Such improvements in ground access coupled with unfettered air access should increase the airport's relative attractiveness for medium- and long-haul services which cannot be served nonstop via National. This in turn should reduce significantly the pressures on National. Certainly, it is an idea worth exploring. It is more reasonable to expand use of Dulles by making service relatively more attractive than by attempting to force a transfer especially when the proposal therefor is as flawed as the current one appears to be. Of course, you can't expect the carriers or the public to shift established transportation patterns on the vague promise of enhancing the attractiveness of Dulles. The pace of the transfer of services must be geared to actual improvements in Dulles access.

To sum up, Midway recognizes that the airport proprietor must in its operating policies take into account environmental factors. However, Midway believes that when airport access is to be restricted, the allocation proposals should, insofar as possible, be directly tied to what is truly being rationed -- in this case noise pollution. Midway further believes that any allocation system designed to apportion access must take into account the policy dictates of the

Airline Deregulation Act and must assure that the door is not closed -- by virtue of cost -- to carriers which are offering low-fare or otherwise novel and innovative services. The existing allocation regime has accommodated such newcomers; its replacement system must do so as well. Finally, Midway urges that the proceeds from any bid allocation procedure which may be adopted be used constructively to serve the system from which the proceeds are derived. If the allocation system is otherwise fair and reasonable and takes into account the foregoing factors, Midway would support it.

Mr. ANDERSON. Please proceed.

TESTIMONY OF A PANEL: WILLIAM C. BURT, COUNSEL, PIEDMONT AIRLINES; RICHARD SKULLY, SENIOR VICE PRESIDENT OF OPERATIONS, AIR FLORIDA; BENJAMIN G. GRIGGS, JR., VICE PRESIDENT, NORTHWEST AIRLINES; CAPT. TOM BUTTION, SENIOR VICE PRESIDENT, EASTERN AIRLINES; AND JACK BOWEN, VICE PRESIDENT, PUBLIC AFFAIRS, MIDWAY AIRLINES

Mr. BURT. As the committee knows, I am appearing here as a substitute for Tom Davis, who is president of Piedmont. Mr. Davis was here all day, and unfortunately, he had a commitment he had made long before the hearings were set, and he regrets a good deal that he could not stay and present the testimony. He particularly wanted to testify because he believes that the FAA proposals to reduce the slots and to extend the perimeter rule, plus the auction, constitutes the most serious threat to the cities served by Piedmont that it has experienced in the 33 years of its existence. And that is why he was particularly anxious to be here.

We have submitted some detailed comments to the FAA.

Essentially, it is Piedmont's position that the FAA policies here would change the character of Washington National from an airport providing short-haul service to an airport giving a clear preference to long-haul service. We think it produces the bizarre result of encouraging long-haul service at Washington National and forcing short-haul services to BWI and to Dulles. Inevitably, we think this will be a drastic and extremely damaging reduction in air service, particularly to the small and nearby cities that we serve.

We have three problems with the FAA proposal. The first is the proposal to reduce the slots and reduce the hours. It is an 18.4-percent reduction. But that is really just the beginning in the reduction in service, because we serve more than one city on a slot. So when you cut out our slots, you are cutting out service not only to the first city, but to the down-line cities as well.

This proposal to cut service quite drastically stems primarily from pressures from noise environmentalists and from those seeking to enhance service at Dulles at the expense of Washington National. The fact that the aircraft operating at Washington National each year are becoming more and more quiet as a result of increasingly stringent FAA noise requirements is seemingly overlooked.

The second problem that bothers us is the new perimeter rule. Washington National has always been regarded as the short- and medium-haul airport, since air transportation in short-haul markets loses its effectiveness if surface times are too prolonged. This proposal invites new long-haul service, and that is inevitably at the expense of shorter haul service. You are going to have more and more service devoted to cities a long way away, less and less to medium and close-in cities.

The third and perhaps most important problem that we have is the auction proposal of allocating slots among the carriers. There has been a good deal of testimony on this, and we think that it is clear almost beyond doubt that the carrier with the longest flight will be able to afford to pay the most for the slots, and the slots will be preempted by the long-haul markets. For example, an Eastern flight to Miami generates about twice the passenger revenue of a Piedmont flight to Charleston, W. Va. So with the same percentage of passenger revenue, a Miami flight could bid about twice as much as a Charleston, W. Va. flight.

We think that this auction proposal, which is, as far as we are concerned, the most serious thing involved here, makes a bad situation worse by giving the long-haul markets a heavy priority in obtaining the reduced slots available and again, the shorter, smaller markets will be the losers.

We have tried to study exactly how much these three proposals would affect service at Washington National. We have not been able as yet to measure the impact of the auction, but the first two—the reduction of slots, plus the perimeter rule, plus some new entrants—will have a very marked effect on the service of Piedmont cities. We serve 25 cities out of Washington National. Twenty-one of those cities will receive reductions in service. The reductions in service will average about 47 percent—in other words, the first two things, the reduction in slots plus the perimeter rule, will cut our service to 21 cities just about in half. It will affect service to 1.3 million passengers. The service deterioration would extend throughout our system. It will affect eight cities in Virginia, four cities in West Virginia, seven cities in North Carolina, and one city in South Carolina. Eleven of these cities are completely dependent on Piedmont for its service. They are not served by anybody else.

We also think that there is one other fact that has to be weighed heavily in assessing the impact of this thing, and that is that service to Washington National is unusually important for nearby cities because it is a major connecting airport. They have many times the percentage of connecting traffic that farther cities have. And Washington National is the big connecting airport. There are more connecting passengers at Washington National than total passengers at Dulles and BWI combined.

We think that the FAA proposal would destroy the quality of connecting service at Washington National, and to a large extent, the connecting service for all the cities that are served there today.

We oppose all of these proposals because of the impact on the service and the cities we serve. However, if for reasons not apparent to us, it is felt that some of these proposals are essential, we urge that at a minimum there should be a new rule which would set aside the same number of slots for cities within 300 miles, excluding New York as are utilized today. Under this 300-mile provision about a quarter of the slots would be reserved for short- and medium-haul service, and three-quarters would still be available for long-haul flights.

Many of these long-haul markets would continue to be well served because they are served with frequent service and because many of them will benefit from the increase in seats resulting from the proposal to allow wide-bodied jets at Washington National.

There is one other thing that we would like to make clear. The loss of certificated service at cities we serve will not be offset by any proposed increase in commuter slots. Although the commuters do provide significant small city service, it is the certificated carriers at Washington National that really provide the bulk of the small city service out of Washington National.

For example, in the States of Virginia, West Virginia, and North Carolina, we serve three times as many small cities as the commuter airlines. We really provide that service far more than they do. Overall to Washington National, Piedmont provides more frequencies and four times as many seats to small and close-in cities as all the commuters that serve Washington Airport combined. If small, nearby cities are to have access to Washington National Airport, commuters cannot do the job, and the certificated carriers have to have the slots.

Thank you very much.

Mr. ANDERSON. Thank you.

Mr. Skully?

Mr. SKULLY. Thank you, Mr. Chairman.

I have a brief summary of my statement. Air Florida supports the ATA's recommendation on the variable slots, and we are opposed to the FAA's proposal which would reduce the capacity of Washington National.

Air Florida considers itself a product of deregulation, and I think it is of interest that the airport's first interstate route was from Florida to Washington, D.C., and that was in December 1978.

We have experienced considerable growth because of this greater freedom from Government constraints. Therefore, it is quite discouraging to see these new Federal regulatory proposals which will impose restrictions on our operations.

As a new carrier at National, we have found the existing scheduling committee has been workable. In April 1979, we started at National with 6 slots, and as of April 1980, we increased it to 12 slots. If we are forced to give up slots, in all likelihood, the newer markets such as Toledo and White Plains will be affected. In fact, in general, we believe the smaller communities, as Piedmont had indicated, would be adversely affected if there is a continuing reduction in capacity at National.

That concludes my comments, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Skully.

Mr. Griggs?

Mr. GRIGGS. Thank you, Mr. Chairman. You have my full statement, and I will summarize it here with the points I believe are important.

My name is Benjamin G. Griggs, Jr., vice president and assistant to the president of Northwest Airlines. I am here today to discuss with you that unique national asset, Washington National Airport, the close-in, convenient, and economical means of transportation for you to visit with your constituents and they with you.

It is our desire to highlight for you the following subjects.

One, Northwest Airlines' pattern of service at Washington National Airport is a service characterized by the broad territorial constituency we serve, the consistency of service throughout the years, and the prominence and importance of Northwest's service to the markets and areas concerned.

We have attached to our testimony exhibits A and B, which are a tabulation, chronological listing and citation of the cities, States and areas receiving nonstop, single-plane and and online connecting services to and from Washington National Airport on Northwest Airlines.

Our service at Washington National extends through Pittsburgh, Pa. and Cleveland, Ohio, where in combination we provide 50 percent of the nonstop service in these markets.

Northwest Airlines provides 75 percent of the single-plane service between Detroit, Mich. and Washington National Airport.

At Milwaukee, Wis., Northwest provides the only nonstop service to and from Washington National Airport. Combining Milwaukee and Madison, primary service for the State of Wisconsin, Northwest provides 94 percent of the nonstop single-plane and online connecting service to and from Washington National Airport.

Our home is in Minnesota, at Minneapolis-St. Paul and at Rochester. Seventy-three percent of the listed convenient services on exhibit A are provided by Northwest Airlines, between the State of Minnesota and Washington National Airport.

In North Dakota, Northwest serves Fargo, Grand Forks, and Bismarck. Seventy percent of the single-plane and online connecting service between these North Dakota cities and Washington National Airport is provided by Northwest Airlines.

We serve six cities in Montana—Billings, Bozeman, Butte, Helena, Great Falls, and Missoula—and we provide all of them with convenient, single-plane or online connecting services through Minneapolis-St. Paul hub to and from Washington National Airport.

One hundred percent of this service in Montana is provided by Northwest Airlines.

In the total for the State of Washington, single-plane and online connections at Spokane and single-plane service at Seattle, Northwest Airlines provides 60 percent of the service to and from Washington National Airport.

In Oregon, at Portland, Northwest's participation of this type is 50 percent. All this data bears testimony to the fact that Northwest cannot reduce frequencies at Washington National Airport without

seriously jeopardizing essential service to major areas and populations of this country.

Our pattern of service to and from Washington National Airport has remained essentially the same for many, many years. Under deregulation, at Detroit, Mich.; at Minneapolis-St. Paul, Minn.; in North Dakota at all the cities we serve, and in Montana, as well as at Spokane, Wash., other airlines have cut out service, begun and ended service to Washington National Airport. Northwest has and cut nothing of this type of service in order to enter any other markets. We continue to serve these areas.

Three, Washington National Airport is a unique and unrivalled national asset that requires an equality of access for United States citizens. Short of closing down the airport altogether—and I do not think any of us view that as a reasonable solution—there is no good way to keep people from trying to use Washington National Airport, save, perhaps, an army with drawn guns and bayonets surrounding it. By not letting larger aircraft use the airport, or by not letting air carrier operational slots have some increase during peak periods, we could bring about the greatest, congested, free-for-all, fight for each seat that the world has ever seen. A 100 percent load factor airport, which the proposed FAA policy seems to be pointing toward, will bring about far more congestion, turmoil and wrath in the terminal and on the access routes than one planned and modified to accommodate the people that we know will try to use it.

And we must not discriminate against those who have a longer air distance and who must pay more for their air fare by forcing them to have the longer ground distance and a much higher ground transportation cost to our Nation's Capital. The citizen who lives 900 miles away from Washington is not a second-class citizen as compared to one who lives 300-miles away.

Transportation from downtown Washington or the U.S. Capitol is in the area of 1 hour shorter to Washington National Airport than to Dulles or Baltimore. The cab fare to Dulles or Baltimore is in the area of \$25. The Metro fare to Washington National is 50 cents. The Washington Metro system was built with millions of dollars of general taxpayers' money. The only way millions of these taxpayers can use it is to be able to enter the Washington area through Washington National Airport. Illogical restrictions deny us the right to use the quick, low cost, local transportation system for which we have helped to pay.

I would like to point out here, in answer to an earlier question, that incidentally, Minneapolis-St. Paul, as an example, is a commuter city from Washington National. Most of my trips between the Twin Cities and Washington are 1-day trips, and people from here can leave in the morning and be in the Twin Cities at 9:15 a.m. and stay there until 5:40 p.m. and be back here the same evening. That is only because we have Washington National Airport. It could not be done at any other.

Section 3 deals with natural constraints on service to and from Washington National Airport, constraints which are understandable to all U.S. citizens. Those natural constraints are primarily geographical. Washington National is essentially a one-runway airport, created by geography, primarily the Potomac River. A one-

runway airport is going to be constrained to a certain number of aircraft operations per hour. Substantial preference, particularly in peak hours, should be given to aircraft which accommodate 50, 100, and 200 of our citizens, and a reduction made in the number allocated to those which accommodate one, two, or five people.

The one runway which can be used by air carriers at Washington National Airport is 6,869 feet in length and is marginal and basically impractical for use with long distance, high gross weight flights.

Without imposing payload restrictions and creating gross weights which would severely increase the noise level near the airport, a 1,000-mile or so perimeter rule is practical, reasonable, and understandable.

The public in any part of the country can understand and accept a perimeter of this type, it being an operational restriction based on geography.

As a matter of fact, Northwest Airlines gives the public in Seattle, Wash. that very choice. They may fly nonstop from Dulles to Seattle, or they may fly from Washington National Airport via an en route stop to Seattle. Some choose one, some choose the other. But I am not aware of any complaints about these patterns of service or the reason for their being there.

The air carriers have paid their fair share for the use of Washington National Airport. As a matter of fact, they have helped to pay for Dulles through National. And I am sure that we can agree to pay for rental and use of new and improved facilities, provided the developmental cloud is taken off the airport, and a policy of reasonable growth to accommodate traffic demand is established.

Four, the importance of relatively distant, noncongested hubs such as Minneapolis-St. Paul, Minn. in providing good access to and from Washington National Airport. On Northwest Airlines, the best example of using a noncongested hub for gathering and dispersing traffic to and from Washington National Airport is the way in which we use Minneapolis-St. Paul.

The geography of the situation is such that if we did not use the Twin Cities in this way, virtually all the traffic that now uses this hub would be forced through O'Hare Airport in Chicago. At O'Hare Airport, such a situation would not only increase congestion and delay everyone's trip, but also make it inconvenient, causing long walks, hot tempers and lost baggage.

No one of the cities served through the Twin Cities east of Seattle, Wash. can support nonstop service to Washington by itself. It requires a collecting point, a hub such as the Twin Cities is, with the local support of the traffic in the Twin Cities and the commuter as well as the regular market between the Twin Cities and Washington to make those flights viable.

The other alternative is, as we have mentioned, the use of Dulles and/or Baltimore. We have had experience in trying to serve Washington from the medium-range distances through Baltimore and Dulles. In the early 1960's, when Dulles opened, we scheduled a pure jet Boeing 720B aircraft between Dulles on the one hand and Detroit, Mich. and Minneapolis-St. Paul, Minn., on the other. That service could not compete with the propeller-drive serv-

ices at Washington National Airport. It died a horrible death for lack of public support.

Today, as stub ends of flights that serve distant points on the west coast and in Seattle, we have flights that operate between Dulles and Boston and between Dulles and O'Hare. Granted on a once-a-day basis, we have, however, tried, by putting in low fares and every other way—we have marketed heavily these services. They do not sell. In no way could those flights be supported without the through traffic on them from Seattle and the Orient.

The one flight that we did have at Dulles when we operated—and this is from my own personal experience—in addition to the nonrevenues such as myself, who went there because we knew we could get a seat, had onboard only a few people who happened to live near Dulles, and in many cases, the overflow from Washington National, people who had gone to Washington National and were upset because they could not get a seat, they had tried that, and they wound up having to be put on a bus to Dulles.

There is one little thing I would like to add here. All of the testimony I have heard on this subject seems to be rooted on a misconception that our history proves is a misconception, and that is that people will go to wherever you put airplanes. They do not. People will go where it is convenient for them. And if there is one airplane at that location, they will try to get on it. And they may call our reservation office and be told the flight is probably full, there might be a no-show, but we do not expect it, and most of them will say, "I am going to try it anyway." This is what they did to us when we had comparable services from Washington National and from Dulles to both Detroit and the Twin Cities. The public is going to make every possible attempt to use the low cost, convenient transportation that is convenient to them, and when that happens, there is real congestion at an airport. Instead of being able to get out of the Metro or cab or whatever and walk to your flight, you wind up in a mass fight in front of the ticket counter or the gate, trying to figure out whether you can get a seat, or the man next to you can, or whatever. This is real congestion, and it has caused a far greater problem than to try to accommodate the traffic that wants to use the airport.

Five, on the noise issue, Northwest Airlines has a record in noise abatement and speaks to the issue of wide bodies on the basis that they are quieter and they are available to serve Washington National Airport.

Northwest Airlines still produces the least noise impact in a comparable flight by the same type of aircraft at Washington National Airport by FAA's own fixed monitoring system.

In October of 1978 at Rosslyn, for example, we were cited as producing half the noise for half the duration with comparable 727 aircraft. In January 1980, after substantial procedural changes had been made, the average duration of Northwest 727 flights at the peak noise level over Rosslyn was 17.2 seconds, compared to all other airline 727 aircraft, which averaged from a low of 26.1 seconds to 35.5 seconds. The duration of the noise exposure from Northwest flights was still close to half that of the others.

There are still ways of operating aircraft with less noise, and there are still ways to improve the noise conditions around close-in

airports. The Minneapolis-St. Paul record is exemplary, as you have heard this morning. And we are proud to be an originating and moving part of that effort. An effort of this type at Washington could produce some of those benefits.

The new wide bodies are quieter at the source; we know that. With, for example, a 1,000 or so mile perimeter restriction, we will be operating at relatively light gross weights, which result in noise levels substantially less than those in the FAR 36 certification condition.

Six, with respect to wide bodies as to why they are needed and how Northwest would put them in service at Washington National Airport safely and efficiently, we believe simply this, if you do not allow wide bodies into Washington National Airport, the pandemonium of the fight for every seat, 100 percent load factor situation, is bound to occur.

We believe that every frequency we operate is a necessary frequency to allow either minimum service to the community, the many that we serve, or the ability to make this 1-day, roundtrip as a commuter between other parts of this country and Washington.

One of our DC-10's has fewer seats in it than two of our 727-200's. So this one-for-two argument makes no sense. That is a reduction in service.

The requirement for frequency and choice of departure and arrival times has been demonstrated by the public. Wide bodies accommodate natural traffic growth at an airport where there is a practical operational limit to the number of frequencies.

You heard testimony from the ALPA and others about the deficiencies at Washington National Airport. Northwest would not propose to use wide bodies, or specifically the DC-10 in our case, at any airport unless we knew we could conduct a safe and efficient operation with them. Our record on this subject is clear. The same type of concerns were raised with regard to jet operations at the Montana airports we serve, particularly those at Bozeman, Butte, Helena and Missoula. My written testimony gives some of the details of how we planned and started this operation. In many ways, because of mountainous terrain and high altitudes in Montana and a relative lack of sophisticated navigational equipment, those airports presented far more problems for a 727 than Washington National Airport would for a DC-10. Nevertheless, Northwest would use this same process, to satisfy itself, to write procedures and to set operational limitations and to teach its pilots in the methods for handling a DC-10 in the Washington National environment.

Seven, finally, what Northwest Airlines needs in the form of Government policy and within the natural constraints of Washington National Airport to continue its pattern of service and record of service in a growing market, is first, the acceptance of two and three engine wide-bodied aircraft; second, we believe there can be a "natural" perimeter on nonstop operations to and from Washington National Airport, including those cities which now receive nonstop service. Third, a higher priority should be given to air carrier and commuter aircraft which serve larger numbers of the general public. Fourth, there should be more flexibility in alloca-

tion of peak hour slots to air carriers where the public demand for service lies, such as is incorporated in our ATA proposal.

Fifth, operating times can be cut back, but they must not fail to recognize the time zone constraints across our country. Examples of this are given in our written testimony. The ATA proposal, with flexible slot allocations and a reduction in the operating hours, is a reasonable compromise.

Sixth, we should institute and carry out with the cooperation of all concerned a noise abatement program which is innovative, takes maximum possible advantage of FAR 36 technology, experiments with new flight tracks and makes use of whatever reasonable and productive noise abatement measures that have been successful in other parts of the country.

And seventh, I might add, there needs to be a master plan completed for reasonable practical growth in the terminal, roadway, and parkway areas.

I thank you for listening to this, and would be pleased to explore these ideas in further detail at your request.

Thank you, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Griggs.

Captain Buttton?

Captain BUTTION. Thank you, Mr. Chairman.

My name is Thomas R. Buttton. I am senior vice president and chief pilot of Eastern Airlines, and with your permission, Mr. Chairman, I would like to briefly recap Eastern's position as it relates to Washington National.

We support the position of the Air Transport Association. We are sensitive to the concerns of the communities surrounding Washington National about aircraft noise, as we are sensitive to the needs of all our citizens, including those other communities who rely on preferred service to Washington National for access to our Nation's Capital.

We believe that 11 years after the imposition of arbitrary restrictions, air traffic control technology improvements and airport land-side improvements justify an increase in the air carriers' service, not a reduction in service.

We believe the noise problems are diminishing, as the aircraft are modified to comply with FAR 36, and as new technology aircraft such as the A-300 are delivered.

We believe it is desirable to reduce the noise impact of our operations and believe it can be done in a way which does not penalize the travelling public.

First, our proposal which limits operations during early morning and late night noise-sensitive hours, while permitting full utilization of Washington National during heavy demand hours, is a more responsible approach than across-the-board arbitrary reduction proposed by the FAA.

Second, there is no question that the advanced technology aircraft and engines offer an opportunity to meet the needed increase in seating capacity and to do so while making far less noise than the aircraft operating at Washington National today.

Eastern, having operated the A-300 for 2½ years and having demonstrated and tested the A-300 at Washington National, is

convinced this aircraft is extremely well suited to meet the environmental and capacity needs of this community.

Our pilots have found the A-300 to be fully as capable of operating into Washington National as our Boeing 727's. FAA noise monitor testing clearly demonstrated that the local community will be the beneficiary.

You will find data and details supporting these statements in our written testimony. Capt. William Preissner, a 38-year veteran of Eastern, who has flown the A-300 and other jet aircraft into and out of Washington National, and Capt. Michael Fenello, our Eastern vice president of system operations safety, a 37-year veteran, are present with me to answer any questions you may have.

Mr. Chairman, we thank you for the opportunity to appear before this committee.

Mr. ANDERSON. Thank you, Captain.

Mr. Rosenthal?

Mr. ROSENTHAL. Thank you, Mr. Chairman.

Mr. Chairman, Mr. Bowen and I are here because Mr. Tague was simply unable to make it today. He had a board of directors meeting which he had to chair.

My commercial is going to be a lot shorter than some others.

Mr. ANDERSON. We have Mr. Tague's statement, and it has been made a matter of the record.

Mr. ROSENTHAL. Thank you, sir.

As you may know, Midway Airlines is the newest and smallest of the regional carriers certificated by the Civil Aeronautics Board. Just last October, we began operating low-price, high-frequency service with Douglas jet equipment out of Midway Airport in Chicago. Our initial route pattern included Kansas City, Detroit, and Cleveland. A month ago, we added service to and from St. Louis, and on June 1, we started service to Washington National.

We operate four frequencies in each direction out of Washington National, and our standard, one-way coach fare is \$85, or \$40 less than the coach fare of our competitors.

We were also the low bidder for Government traffic, and were recently awarded a contract by GSA to carry Government personnel between Washington, D.C. and Chicago.

We estimate the use of our services by Government personnel could result in U.S. Government savings, just for air transportation, of over \$2 million annually. In addition, reduced transit time and ground transportation costs, because of Midway's proximity to downtown Chicago and most U.S. Government offices, will increase those savings. The U.S. Government, therefore, has an economic stake in the continuity of Midway Airlines' services in the Chicago-Washington market.

The future of Midway's Chicago-Washington service is tied to the terms under which air carriers are afforded access to National. Were those terms to preclude Midway from effectively serving National, while our O'Hare-based competitors were able to do so, we would be foreclosed from the market. We simply do not believe that a Midway-Dulles service would be viable.

It is in that context that we have approached the FAA's proposal to place new and more restrictive constraints on access to National,

with the stated objective of diverting service to Washington's other airports.

We believe that opening National to two and three engine wide-bodied jets will encourage the use of the airport for long-haul services, and that the effect could be to divert traffic from Dulles rather than to it, and that increasing the perimeter radius from 650 to 1,000 miles would accelerate this potential diversion. Coupling use of wide-bodied aircraft with a bidding system for a landing or takeoff slot, as is now being contemplated by the FAA, would drive low-priced express services such as Midway from the market.

An operator of a DC-10 aircraft with 270 seats can afford to bid on a peroperation basis much more than the operator of an 83-seat DC-9. And because it would be economically impractical and operationally impossible to operate with DC-10-type equipment on the Midway-Washington route, Midway could bid successfully for access only by raising its prices to a point that it loses its identity as the low-priced alternative.

The ultimate result would be that Midway would be forced from the market. I can assure you that the public neither wants nor needs an additional Washington-Chicago carrier charging rates comparable to those of the established trunk carriers.

We agree with the FAA's view that National Airport access policy must take into account policies of the Airline Deregulation Act. However, the FAA must take into account the act in its entirety. It cannot limit its focus to just those aspects related to the strengthening of commuter air carriers. The act directs the agencies to encourage air services at satellite airports such as Chicago's Midway, by, and I quote:

Fostering an environment which reasonably enables carriers whose exclusive responsibility is to serve such airports to establish themselves and to develop their secondary or satellite services.

As this committee is well aware, the Congress and at least two administrations sought for years to have Midway Airport reactivated. But until Midway Airlines started service, Midway Airport was practically deserted, and at the risk of being closed and the property disposed of for a commercial real estate development.

An airport access policy for Washington National which fails to foster an environment that reasonably enables carriers such as Midway to continue Washington National services would be as inconsistent with the will of Congress as would be a policy which required commuter carriers to vie with wide-bodied jets for access to the facilities.

The FAA this morning said something about segregating out classes to bid. The segregation that they talk about, I believe, is for commuter carriers to bid against commuter carriers, but they would have us bidding against wide-bodied jets.

The FAA is clearly interested in developing an auction system to allocate slots at National. In my judgment, it is appropriate for that agency to develop an alternative to the current airline committee system for dividing a limited number of access slots among prospective users.

The committee system is fraught with difficulty and could break down at any point. To be caught without an alternative method for

use in such an event would be folly. But any allocation system must be such as to assure that National remains as the primary airport for small communities and small commercial jet aircraft service, with Dulles playing a growing role for medium- and long-haul services and larger aircraft. I want to emphasize that I am not recommending abandonment of the committee system in favor of an auction or any other untested form of allocation while the existing arrangement still functions and satisfies the objectives to which I have just referred. To my constant amazement, the committee system has worked so far. I have heard no carrier arguing that they have been unfairly treated or the system must be replaced. Under these circumstances, I am puzzled by what seems to be a hell-bent approach to terminate the current allocation system and replace it with an untested, FAA-administered system of one sort or another.

Mr. Snyder, I think the idea of putting some constraints in the ADAP bill on the FAA is an excellent one.

Mr. SNYDER. You will have to help us get the votes.

Mr. ROSENTHAL. I think you will get a lot of help.

Mr. ANDERSON. Mr. Bowen?

Mr. BOWEN. I have no comments.

Mr. ANDERSON. I would appreciate the comments of Captain Buttton and any other members of the panel on two safety-related questions which were raised in last week's hearings.

First, the Air Line Pilots' Association suggested that there is a serious wake vortex problem with wide-bodied jets which requires a separation distance of 10 miles between wide bodies and other aircraft.

Do you agree with this statement, and if so, does it indicate that use of the wide bodies would require reduction in the 60 operations an hour presently authorized?

Captain BUTTION. Sir, I disagree with the statement, and I also disagree that we would have to reduce the number of operations per hour at Washington National. I do not believe wake vortex is unique to Washington National Airport with the advent of wide-bodied aircraft. I think the current aircraft also give off wake vortex to a lesser degree than maybe a heavily loaded wide-bodied aircraft.

In addition, the testimony of ALPA more or less indicated that Washington National Airport, because of it being constrained, would subject aircraft to more wake vortex than maybe it would at any other airport. But, sir, I give forth to you the fact that any time you use an electronic device to approach an airport or a specific runway that keeps you to the parameters of the localized runway and the glide path, you in effect, whether it is over the prairie of Texas, the Potomac River, or the bluegrass of Kentucky, it is going to keep you in the same narrow path. So, I do not believe that is a valid statement, sir.

Mr. ANDERSON. Mr. Griggs, do you have a comment on this point?

Mr. GRIGGS. Mr. Chairman, I might just add that I do not think any of us envision that the number of wide bodies that would be using Washington National are such that they would impact to any great degree the situation. And I would certainly emphasize the

other, that it is no different than any other airport; it is not a Washington National problem. But we would, because of the type of service here, not have that many wide bodies to spread this thing out to a degree that I think would be discernable.

Mr. ANDERSON. In his testimony, Congressman Carr raised several questions about the safety of aircraft operation at National Airport. He pointed out two problems. First, he stated that the air carrier runway at National is not alined with the prevailing winds, and that there are dangerous turbulent crosswinds from the Crystal City direction. Second, he claimed that the river approach to runway 18 requires maneuvering the aircraft at sometimes spectacularly high rates of bank, turn rates, and at very low altitudes. I would appreciate your comments on whether the conditions cited by Congressman Carr create serious safety problems for operations at National Airport.

Captain BUTTION. Sir, I would like to address that also, if you will. Our meteorology department did a little study, as far as the wind is concerned at Washington National and as far as the runway alinement is concerned—

Mr. ANDERSON. We, being who, now?

Captain BUTTION. Eastern Airlines.

We found that 37 percent of the time, the wind is less than 8 knots, or 8 knots or less. When the wind is greater than 8 knots—and of course, 8 knots does not affect you one way or the other; you can land with the wind or downwind with that amount of wind—we found that 23 percent of the time when we exceed 8 knots, the winds out of the northwest to the northeast quadrant, that 20 percent of the time it is through the southeast to the southwest quadrant, and only 20 percent of the time is it out of the east or the west. So we feel that you could not get a runway more alined to that type of wind.

Now, as far as the approach down the river, sir, we have many approaches throughout the world, and I can at least cite the approach on 13-left at JFK, where you are in a continuous turn right down to 200 or 300 feet above the ground, and if any of you have been in Hong Kong, you are also aware of the approach in Hong Kong, where you start a 60-degree turn right at 500 or 600 feet, after an ILS approach toward the mountain.

So we do not think—and I think the safety record of Washington National proves—that that is anymore difficult than an experienced pilot could perform on a daily basis.

Mr. ANDERSON. The FAA's environmental impact statement shows that under the present pattern of operations at National Airport, a substantial area is subject to noise levels of NEF-30 or greater. These noise levels are considered unsuitable for residential development. The FAA estimates that based on 1979 operations, the area around National subject to NEF-30 or greater is approximately 26 square miles and that more than 100,000 persons live in this area.

Would you agree with the implication of FAA's estimate that present operations at National subject a substantial number of persons to unacceptable levels of noise, and if so, what proposals do you have for improving the situation? And, do you have any estimates of the effect of this proposal on the NEF-30 noise contour?

Mr. Skully?

Mr. SKULLY. I heard Mr. Wilding's comment in response to that question. I think, for those of you who are familiar with the NEF concept, it is a very subjective device. And when we speak of the way it is weighted—in other words, it doubles the count and the weighting once it gets beyond the curfew hour—and this is why he made the point that numerically, it would be improved if the curfew were cut off earlier at the 9:30 point.

And if you reviewed my background, I headed up the Office of Environmental Quality with FAA for over 3 years. And I have done considerable work at Washington National, stood in the rain and listened to noise meters. I had the whole track; long before a Cabin John resident arrived there, I was out there with a noise meter. So I think I have some feel on this subject.

I do believe that with the FAR 36 aircraft coming into this system, and they are, the new technology aircraft will be the greatest gain in reducing noise than any of the techniques that we have come up with today. I think the testimony this morning also indicated that they were getting as many complaints outside the NEF-30 as they were in, so it is not a line on a map that is discernible and says that if you are inside that line, you are in big trouble, and if you are outside, you are safe. It is not that at all.

I would like to make a comment on the wide-bodied aircraft as it relates to Air Florida's position. We do feel that if a wide-bodied aircraft is used, then the result should be in a loss of the slot for the operator.

I do have some views on the safety implications on wide-bodied aircraft. I find no problem whatsoever on any of the current inventory of wide-bodied aircraft operating into and out of Washington National.

Thank you.

Captain BUTTION. Mr. Chairman, may I comment, please?

Mr. ANDERSON. Yes, sir.

Captain BUTTION. Since we have operated the A-300 into Washington National at least twice—once in April of 1978 and once in June of 1978—and of course, in the April 1978 time frame, we had all the noise monitors established up and down the river—our first approach into Washington National was from the north, down the river, and we landed south. Subsequently during the day, we flew a number of flights, and our takeoff was to the north and our landings were from the south, obviously.

During that period of time, the noise monitoring system indicated about a 77 PNDB rating both for takeoff and landing; maximized landing was 77, and one of them was 73. And I would just point out to you that that is substantially below the current fleet of aircraft that are flying in and out of Washington National today.

I would also indicate to you that I was the chief pilot for Eastern here in Washington from July of 1961 through the end of 1972, and I participated with the FAA in establishing the current noise abatement policy, and in fact, part of the noise abatement in there, where it allows us to use DME north and DME south, which is distance measuring equipment, to maintain power to clean up the airplane and allow it to more or less glide through at a higher speed, because noise again is subject to the time that it is penetrat-

ing. I did work substantially, and we found that that was much, much quieter than what initially was developed by the FAA.

So we think that there are ways to reduce the noise level and certainly the high technology aircraft such as the A-300 will substantially reduce the noise for the neighborhood and the community. So we really do not see why a reduction in frequency should occur because you use wide bodies. In fact, it will help the community.

Mr. ANDERSON. Mr. Griggs?

Mr. GRIGGS. Mr. Chairman, I just wanted to add that most of the statistics you see on the NEF-30 contours and such are based on FAR-36 measurements, which are at maximum gross weight under prescribed conditions. As I tried to point out in my testimony, our operations at Washington would be far lower weights, which means less noise.

I should also point out that while that is no consolation to the people involved, you ought to know that through this country, there are well over 6 million people exposed to this same NEF-30-type contour.

Washington does not bear this burden alone, or the citizens around here. It is prevalent throughout our country, unfortunately, and we are trying all ways to reduce it. But it is not a peculiar Washington problem.

Mr. ANDERSON. At our hearings last week, it was stated that under current regulations, the airlines schedule 18 flights at 9:59 p.m. These flights are not completed until 10:30 or later and represent a source of great annoyance to local residents.

Do the members of the panel think that this is a serious problem, and if so, how do you think it should be remedied?

Captain BUTTRON. As far as Eastern is concerned, sir, we support the ATA policy, and the ATA policy is to reduce the early morning departures to a lesser number than 40 and the late night departures to a lesser number than 40, and make use of what we call the prime time hours, when people are normally subjected to ambient noise levels. And so that was one way the ATA was proposing to reduce that problem.

Mr. ANDERSON. In the opinion of the panel, is Federal management of the Washington airports the best way to manage these airports? What would be the advantages or disadvantages of, for example, changing to a federally owned corporation or a locally controlled airport authority?

Mr. Skully?

Mr. SKULLY. I would suggest we leave it under Federal control. In my view, Washington National is an airport serving the Nation's Capital, and not the local community.

Captain BUTTRON. I would add one qualifier to that, sir. I appreciate that the FAA is the good management team as far as the airports are concerned, and Eastern is happy with them. We would add to the fact that they are and present to the other airports' management personnel a kind of leadership role in the fact that anything they implement here can find its way into the Nation, such as Orange County and John Wayne Airports.

Mr. ANDERSON. Do the panel members believe that the operator of National and Dulles airports, whether it be the Federal Govern-

ment or some other entity, has any right to take steps to encourage or discourage the use of the two airports for different types of operations. Is there any limit on the obligation of the airport operator to develop facilities at National to accommodate all passengers who wish to fly there?

Mr. Griggs?

Mr. GRIGGS. Mr. Chairman, there is, as I tried to point out in my testimony, some very practical geographical-type limits on it. But I do not think we have approached them yet, and I think all of us agree that there are things that can be done, particularly on the ground, on the so-called ground side, in the terminal, baggage claim, roadway system, et cetera.

I do come back to the fact that I think it is the airport operator's prime responsibility to develop his airport in such a way that it is responsive to the demands of the public. And I think we have seen that no matter what we do, the public demands, asks for, and tries to make use of Washington National Airport.

Therefore, it seems to me that it is this airport operator's responsibility to try to find a way to accommodate the people who want to and need to use that facility.

Captain BUTTION. Mr. Anderson, I would just add one more comment to that also, and I seem to be taking a lot of positions here. But Eastern, for quite a number of years, has programed to expand its facilities. Even though we now have wide-bodied gates available, and we have built wide-bodied gates in the anticipation that Washington National may sometime in the future become a wide-bodied airport, we have also set aside a substantial amount of funds to refurbish and add to Eastern's facilities. We need a policy so that the Washington National Capital Planning Commission may move forward in approving this expansion or this revision to our facilities.

Mr. ANDERSON. Last week, we heard testimony that development of I-66 and the Dulles access road, which will be completed in the next few years, will make it possible to travel on interstate highways from Dulles Airport to downtown Washington. These improvements should reduce traveltime to Dulles by about 15 minutes.

Do these improvements make service to Dulles substantially more acceptable to your passengers?

Mr. BURR. Well, in the first place, it is my understanding that those improvements will not be in place until late 1985. Beyond that, the traveltimes at Dulles are so extensive that it is not going to make a lot of difference. The Council of Governments has a study of traveltimes that shows that in the peak period, the round-trip traveltime is 2 hours and 9 minutes on the bus, and it would still be very substantial if you cut 30 minutes off that.

I do not think people quite appreciate the problem that a person who comes into Dulles has in terms of traveltime. He not only has an extended bus time; he comes in there, and he has to wait for the bus to take off. Then the bus goes to downtown Washington, and then he has to take a taxi from the bus station in downtown Washington to his destination.

He is involved in traveltimes that are three or four times the air times when he is coming from a city like Roanoke. It seems to me

for short-haul cities, where the time in the air is less than an hour, to impose that kind of a surface burden on the passenger is to make the air service pretty useless.

Mr. ANDERSON. How do the members of the panel analyze the amounts which airlines could bid for slots to operate particular flights? Would the amount of bid depend on the revenues that the flight would generate, or would the airlines mainly consider the profitability of the flight? If profitability is important, wouldn't the airlines be willing to bid as much for some short-haul flights as they would for long-haul flights?

Mr. BURT. I do not quite see the mathematics of that, because the profit per mile, for example, on a long-haul flight leads to total dollar profits that are much more substantial than on a short-haul flight. And the bidding leverage is there, to bid twice as much, whether you relate it to passengers or whether you relate it to passenger revenue or whether you relate it to profits. The inherent advantage is in the long haul, because the bid is in dollars. Revenue dollars are greater, and profit dollars are greater, and the long-haul bidder has an almost overwhelming advantage.

Mr. ANDERSON. Aren't some of the short hauls pretty profitable?

Mr. BURT. Well, they are profitable, but they do not have the dollar profits that the long-haul flights do. They may make as much per mile, but the other flight goes twice as many miles, so it has twice as many dollar profits.

You have twice as many dollars at your disposal on a flight that is twice as long as another flight, if you assume the same level of profitability.

Mr. SKULLY. Mr. Chairman, could I comment on that?

Mr. ANDERSON. Yes, sir.

Mr. SKULLY. We are a low-fare airline, and our fare to Miami currently is \$85, which is about half the coach fare of any of our competition. Obviously, on any kind of an auction system, that would be eliminated.

I think one of the things that I cannot quite understand on the proposed auction system is that in fact, you would have to auction the airport off, not just the frequency and the times.

For example, we have no space at Washington National; we have no gate. Currently, we are being handled by United Airlines. And if we were to bid at a time that was competitive with United, even though we are not in competition on routes with them, but if they are running at the time that they do not want to handle us, we can have a delightful time to come in, but no place to park the airline, and no one to ground handle, pushback, everything associated with it. And the same is not only true with me, but I am sure it is true with Midway.

Mr. ANDERSON. Mr. Rosenthal, in your testimony on page 3, you state that a fullyloaded FAR-36 wide-bodied three-engine jet can create substantially more noise than a comparably loaded narrow-bodied equipment which meets FAR-36. The wide bodied most frequently referred to for service at National is the A-300 airbus. I believe this aircraft is quieter than the 727 by about 10 EPNDB on takeoff; 7 EPNDB's for sideline measurement, and one EPNDB on approach.

Do you disagree with those figures, and if not, what aircraft—

Mr. ROSENTHAL. No, I do not disagree with the numbers that you have given for the A-300. But if you will take a look at probably the same FAA advisory circular that you have gotten those numbers from, which is No. 36-3, dated May 29, 1979, you will find on takeoff configuration, that the DC-10-30 with a CF-6 engine has NDB's of 95.4, and if you take a look at a DC-9-10 with a JT-8 engine, the rating is 77.3. So you are talking about an engine situation with the DC-10-30 which is about 25 percent more noisy than the DC-9-10.

Mr. GRIGGS. Mr. Chairman, again I need to point out that those are max takeoff weights, full of fuel and full of passengers, and there are not going to be any such operations—they cannot get off the runway that way at Washington National Airport.

Mr. ANDERSON. Mr. Snyder?

Mr. SNYDER. Mr. Chairman, I am going to abbreviate my questions a little bit more than Mr. Griggs did his statement.

I did have a question that Congressman Bafalis wanted me to ask Mr. Skully, but I think that you have answered it adequately enough—it had to do with the bidding system, so I am going to defer that.

I did want to comment, though, Dick, that recognizing your background and the fact that you have been up here testifying before in another capacity, I was interested in the observation on the bottom of page 11, where you say:

Therefore, we urge the FAA's proposal be carefully reviewed for the express purpose of insuring that the judgment of Federal bureaucrats will not be permitted to be substituted for those of carrier management.

Now, I want to tell you, that new-found morality now that you are out in the real world amazes me. [Laughter.]

Mr. SKULLY. I am glad you read it, Congressman Snyder.

Mr. SNYDER. How does it feel out in the real world?

Mr. SKULLY. I do not enjoy coming to congressional hearings, but I enjoyed this part of it better than I normally do.

Mr. SNYDER. Captain Buttton, in your statement, you indicate in part that additional noise at National is caused by general aviation operations which are unrestricted during VFR time.

I suspect there is some truth to that, but Eastern also operates extra sections of the shuttle to New York over and above the one slot per hour allocated thereto, I believe.

Captain BUTTION. Yes, sir.

Mr. SNYDER. Don't these additional flights make additional noise?

Captain BUTTION. I believe they do, sir.

Mr. SNYDER. How many additional airplanes would you guess that Eastern operates under the extra section provision of the rules on a busy day?

Captain BUTTION. Well, sir, I know what the number is on a total basis for the total air shuttle operations. Broken down to Washington, I do not have that number, but on the total heavy days, say, a Friday afternoon, approximately 32 between La Guardia-Boston and La Guardia-Washington, Washington-La Guardia, and La Guardia back.

Mr. SNYDER. Wouldn't that make a little more noise than those extra GA planes you are talking about?

Captain BUTTION. Well, I think probably the GA airplanes, sir, are about the same in number, or maybe more.

Mr. SNYDER. Yes, but wouldn't your planes make a little bit more noise—wouldn't your extra planes make more noise than their extra planes?

Captain BUTTION. Probably, yes, sir.

Mr. SNYDER. I am generally on the same side that you are on this issue, I think, but I also have a soft spot in my heart for general aviation.

Captain BUTTION. I do, too, sir. I own an airplane, myself.

Mr. SNYDER. I want to thank all of you for being here. I appreciate your testimony. It is way past your executive drinking hour, so I will let you go.

Thank you. [Laughter.]

Mr. ANDERSON. Mr. Fary?

Mr. FARY. Thank you, Mr. Chairman.

I wish to welcome the panel, and before I start, I would like to give a special welcome to my friends from Midway Airlines, Mr. Bowen and Mr. Rosenthal.

Midway is in my backyard, as you all know or have known during the past 5 years that I have been here, and in the past 10 years, the "Big Three", United, TWA, and American, paid the rent on the counters and the hangars, and so on and so forth, but it took Jack Bowen to finally break the ice.

Talking and listening about the gates today, it was kind of amusing to me, because as you know, Jack, we have no gates at Midway; we slide down the chute. Midway was a ghost town, the world's busiest at one time, and it turned out to be a ghost town, and by golly, it was really a problem. There was a desperate need for utilization and service.

You hang in there, and believe me, if I have to come down a rope ladder down here in Washington, I will be tickled to death to do it, because you have saved a lot of time and transportation, and pricewise, even though the Government pays for my freight, I still have a little obligation, morally, to keep it as low as I can. It is a tremendous timesaver.

I have a couple of quick questions here. I have always hoped that I would have the opportunity, Jack, to see you appearing before this committee and members of your corporation, as long as I am here, while I am still on the committee. I would like to welcome Northwest to Midway Airport's family, also, and I hope that they profit from the decision to start service between Midway and the Twin Cities.

Could the members of the panel tell us how many slots they have at National, and how many they use; under the proposed auction system, how much do you think it would cost you to purchase the slots you have now? At what points would you give up your slots?

Mr. SKULLY. I can give you the total we have. We have 12, and we use 12, and I do not know the answer to the other questions.

Captain BUTTION. Sir, I would comment to the fact that on Eastern, we are about 20 percent of the total operation at Washington National; of the 500-plus that the airlines are using, I think Eastern is in the neighborhood of 134 on a daily basis, I believe.

And I might add, sir, that that represents a reduction from those we have requested of the committee, and some of the slots being enjoyed by Midway and Air Florida today represent flights that have been waived by Eastern.

Mr. FARY. How much of your traffic through Washington National is connecting traffic to other cities? If the curfew were moved to 9:30, how many schedule changes would you have to make?

Captain BUTTION. I do not have that information specifically, sir. Of course, we run a large shuttle operation out of Washington National to LaGuardia. We connect, on Eastern's system, 107 cities. Through Atlanta, we connect to the Southeast, obviously—Florida, Alabama, Georgia, South Carolina, North Carolina, and down through Alabama, Louisiana, and Texas. And we are now also going out West, to Dallas, Albuquerque, Phoenix, Las Vegas starting July 2, and Reno. So that we have a substantial connecting pattern out of Washington National down through Atlanta.

Mr. FARY. I would like to ask Air Florida did you seek to serve Dulles first?

Mr. SKULLY. Yes, sir, we did. We started in December 1978 and ceased in April 1979.

Mr. FARY. Wouldn't you have been better off to serve National from the beginning?

Mr. SKULLY. I think we would have. The time frame from the time we were approved as an interstate and the time to get slots—we did not ask for them in time to start our operation, so we started immediately into Dulles.

Mr. FARY. If you had to move all your operations to BWI or Dulles, how would that affect your business?

Mr. SKULLY. I think we would probably cease operation into the Washington area.

Mr. FARY. What role do landing fees play in deciding to serve an airport, in your opinion?

Mr. SKULLY. It was not landing fees. We were going to be forced into using the mobile lounge at Dulles by the airport management. The use of the mobile lounge for our type of operation meant additional ground time, and the handling at Dulles for a small carrier that expects to be turned in 20 minutes, we were being handled by a long-haul company, whose name I will not use, but we are generally accustomed to turning aircraft in 2 hours, and our ground time—we could not afford the ground time that it took at Dulles to survive.

Mr. FARY. Just one other statement. The noise at Midway is sweet music to the people there, because it revitalizes the economy, puts the spark that we need, and puts people to work. And believe me, Jack, we have accomplished something, and we will get that thing rolling, and rolling very heavily.

I thank you very much, and I yield back my time, Mr. Chairman.

Mr. ANDERSON. Thank you, Mr. Fary, and thank you, gentlemen, for an excellent presentation.

The meeting is adjourned.

[Whereupon, at 6:45 p.m., the subcommittee was adjourned.]

ADDITIONS TO THE RECORD

FROM MEMBERS OF CONGRESS

L. A. "SKIP" BAFALIS
19TH DISTRICT, FLORIDA

WAYS AND MEANS COMMITTEE

HOUSE COMMITTEES
PUBLIC ADMINISTRATION AND
EMPLOYMENT ORGANIZATION
TEAM

Congress of the United States
House of Representatives
Washington, D.C. 20515

May 30, 1980

WASHINGTON OFFICE
2055 Rayburn House Office Building
Washington, D.C. 20515
205-225-2530

DISTRICT OFFICE
Room 105, Federal Building
Fort Myers, Florida 33901
913-234-4431

700 VANDERBILT AVENUE
FORT PIERCE, FLORIDA 33902
305-655-5710

Hon. Glenn Anderson, Chairman
Subcommittee on Aviation
Committee on Public Works and Transportation
2165 Rayburn Building

INSIDE MAIL

Dear Mr. Chairman:

This is to register my strenuous objections to proposed reductions in "slots" at Washington National Airport. As I understand it, the proposal would result in 18% fewer "slots" with as many as 5,000 passengers daily losing this convenient access to their Nation's capital.

As for me personally, I commute almost weekly to Florida to my Congressional District. Because of high passenger loadings to the Sunshine State and the vagaries of Congressional schedules, it is already difficult to obtain reservations when I need them. Any further reduction in flights in and out of National Airport will make my travel high onto impossible.

Further, the present number of "slots" and existing commercial schedules permit Florida constituents with business in Washington to make the trip up and back in the same day. This convenience would likely be lost if this proposal is implemented.

Thank you for permitting me to register my thoughts and objections to this proposal.

Sincerely,


L.A. "Skip" Bafalis
Member of Congress

LAB/Nls

STATEMENT OF THE HONORABLE CHARLES E. BENNETT
BEFORE SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
JUNE 12, 1980

I strongly oppose the Federal Aviation Administration's proposal to severely restrict access to Washington National Airport by the scheduled airlines. The FAA proposal would reduce daily scheduled air carrier operations at National Airport while also reducing the total hours of operation at the airport. Under the proposal, daily operations at National would be reduced by about 20 percent, or 118 landings and takeoffs. The limitation on hours of operation would also inhibit the ability of the airlines to schedule flights to meet travel demand.

The FAA proposal unnecessarily jeopardizes substantial amounts of air service between Washington's close-in airport and many prominent communities, including my hometown of Jacksonville, Florida. The reduction in air carrier operations could mean the loss of service for as many as 5,000 passengers daily. In my opinion, the FAA plan needlessly penalizes the air traveler who depends on scheduled air carriers for convenient service to and from Washington.

Cities in my state receive a significant level of service from National Airport. There are more than 45 daily flights between National Airport and Florida which provided service for more than one million passengers last year. The four daily nonstop flights between Jacksonville and National Airport carried a total 164,070 passengers during the past year. The FAA plan would certainly have an adverse effect on Washington-Florida air service, and I think it is ill-advised to impede access to our nation's capital.

The FAA proposal seems to overlook the fact that the airlines themselves

have acted to minimize any adverse effects resulting from National Airport's location. The airlines have done this by substantially reducing the number of flights while increasing the number of passengers carried. They have also reduced noise through the use of new and quieter aircraft and special noise abatement procedures.

I believe the FAA plan is too restrictive. It needlessly penalizes the air traveller while reinserting government regulation into the air transportation business in a manner inconsistent with the Congressionally-mandated policy of deregulation. The FAA should consider less disruptive alternatives.

////////

CHARLES E. BENNETT

Member
10 District, FloridaARMED SERVICES COMMITTEE
CHAIRMAN OF SUBCOMMITTEE
SUBCOMMITTEEWASHINGTON OFFICE
100 PENNSYLVANIA BUILDING, SUITE
700 NORTH WASHINGTON, D.C. 20540JOHN W. POLLARD, JR.
ADMINISTRATIVE ASSISTANT

Congress of the United States

House of Representatives

Washington, D.C. 20515

June 5, 1980

JOHN W. POLLARD, JR.

ADMINISTRATIVE ASSISTANT

THOMAS A. MILLER

ADMINISTRATIVE ASSISTANT

DOROTHY H. GIBBS

LARRY M. GIBBS

BARBARA L. GIBBS

PATRICIA A. GIBBS

BARBARA L. GIBBS

Honorable Glenn M. Anderson
U.S. House of Representatives
2410 Rayburn House Office Building
Washington, D. C. 20515

Dear Glen:

We are writing you concerning the Federal Aviation Administration's proposed changes to Washington National Airport. As Representatives from communities that benefit from service to Washington National, we feel compelled to register our strong protest against the FAA plan and urge the FAA to consider less disruptive alternatives.

Our primary concerns with the FAA rule center on the reduction of daily scheduled air carrier operations at National and on the reduction of the total hours of operation at the airport. Flights to and from National by the air carriers would be reduced approximately 20 percent under this proposal. The limitation on hours of operation will also inhibit the ability of the airlines to schedule flights to meet travel demand.

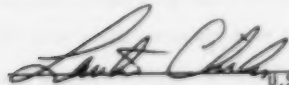
Florida's cities today receive a significant level of service from National Airport. There are more than 45 daily flights between National Airport and Florida which provided service for over one million passengers in 1979.

We believe that the new FAA plan will adversely affect air service between our communities and Washington, D. C. This is one of our most vital air transportation links, and we cannot afford to have access to the Nation's capital hindered.

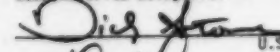
The FAA proposal, in our view, is unnecessarily restrictive. It needlessly penalizes the air traveller who relies on U.S. scheduled air carriers for convenient service to and from Washington. And it appears to reinsert government regulation into the air transportation business in a manner that is inconsistent with the clear-cut congressional policy of deregulation.

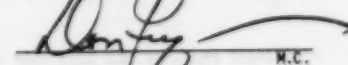
Sincerely,


Charles E. Bennett, M.C.
Dean, Florida Delegation


L. C. Chiles
U.S.S.


Don Rostenkowski
M.C.


Dick Cheney
U.S.S.


Dan Quayle
M.C.

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBER

(continued)

Honorable Glenn M. Anderson
Page -2-
June 5, 1980

Sam H. Gibbons H.C.

Paul Papp H.C.

Bill Chappell H.C.

Shap Bafaki H.C.

Bill Lehman H.C.

() H.C.

Andy Wilson H.C.

Reynolds H.C.

Earl Hutto H.C.

Bill Nelson H.C.

D. M. M. H.C.

John H. H. H.C.

LINDY (MRS. HALE) BOGGS, M.C.

In District, Louisiana

COMMITTEE:
APPROPRIATIONS

WASHINGTON OFFICE:

1201 LAMARCA BUILDING

WASHINGTON, D.C. 20511

BARBARA BAYNE

ADMINISTRATIVE ASSISTANT

Congress of the United States
House of Representatives
 Washington, D.C. 20515

June 4, 1980

Honorable Glenn M. Anderson
 Chairman
 Subcommittee on Aviation
 Committee on Public Works and Transportation
 U. S. House of Representatives
 Washington, D. C. 20515

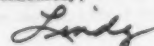
Dear Mr. Chairman:

Delta Air Lines, Inc. has made available to me the enclosed correspondence concerning the Federal Aviation Administration's proposed Metropolitan Washington Airports Policy.

As you will note, Delta is particularly concerned about the proposed 18% reduction in scheduled air carrier operations at Washington National Airport, as well as the proposed curfew of 9:30 P.M., and feels these new operating restrictions would seriously curtail service to and adversely impact on air travelers from Southern cities. In view of the oversight hearings on the proposed policy which are scheduled for June 11th, I wanted to make a copy of Mr. Dullum's letter available to you for the Subcommittee's consideration.

My kindest personal regards and best wishes.

Sincerely,



Lindy (Mrs. Hale) Boggs, M. C.

LB:mpk

Enclosure

DELTA AIR LINES, INC.
1000 K St. N.W.
WASHINGTON, D. C. 20006

MERVIN F. DULLUM
Vice President
Government Affairs

June 2, 1980

Dear Congresswoman Boggs:

This will refer to the Federal Aviation Administration's proposed regulations contained in Dockets 19948 and 19950 pertaining to the Department of Transportation's recently announced policy changes for Washington National Airport.

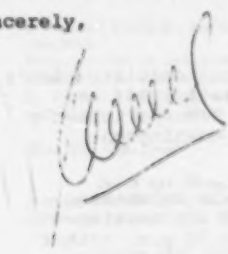
The proposed new policy embodied in this rulemaking includes an 18% reduction in scheduled air carrier operations, and a curfew starting at 9:30 p.m. rather than 10:00 p.m. Delta strongly believes that these new operating restrictions ignore the important and vital public benefits which Washington National Airport provides to air travelers from the South. Certainly, a curtailment of airline operations at Washington National Airport could seriously jeopardize existing and future service to and from the Nation's Capital.

Delta is cognizant of the strong and continued interest of the Louisiana Congressional Delegation and the New Orleans community in the establishment of nonstop service between New Orleans and Washington National Airport. We are also aware of your strong support for that portion of the proposed new Washington National Airport policy which would extend the perimeter rule to 1,000 miles so as to permit cities such as New Orleans to receive nonstop service. As reflected in the attached letter from David C. Garrett, Jr. to Mayor Ernest Morial, Delta supports the proposed perimeter extension from 650 to 1,000 miles. However, we are deeply concerned about the impact the new policy's proposed reduction in air carrier operations could have on the availability of "slots" for new service to cities in the 650 to 1,000 mile range.

Given these circumstances, we would greatly appreciate your support in opposition to those portions of the proposed regulations which seek to drastically curtail commercial operations at Washington National Airport.

If you share our anxiety about this matter, we hope you will make those sentiments emphatically known to the Federal Aviation Administration and the House Aviation Subcommittee prior to their hearings on this issue scheduled for Wednesday, June 11, 1980.

Sincerely,


The Honorable Linda Boggs
House of Representatives
Washington, D.C. 20515

DELTA AIR LINES, INC.

HARTSFIELD ATLANTA INTERNATIONAL AIRPORT

ATLANTA, GEORGIA 30320

DAVID C. CHAMBERLIN, JR.
PRESIDENT

May 20, 1980

The Honorable Ernest N. Morial
Mayor of New Orleans
New Orleans, Louisiana 70112

Dear Mr. Mayor:

This is in response to your May 12, 1980 letter addressed to Mr. W. T. Beebe about Delta's "grass roots" campaign in which we solicited support of southern cities in opposition to the FAA's latest proposal to restrict capacity at Washington National Airport. Delta's actions were a portion of a comprehensive program coordinated by Air Transport Association in which numerous airlines participated.

We would like to point out that Delta's efforts in the Washington National Airport campaign were directed exclusively at the proposals of reducing capacity there by 18%. We did not at any time suggest that the portion of the FAA policy to extend the nonstop perimeter be changed because Delta favors the proposed perimeter extension from 650 to 1,000 miles. This information was conveyed to your executive Assistant, James Chubbuck, by Delta's James A. Chamberlin in mid-April 1980. We understood from Mr. Chubbuck that your office would join us in opposing FAA's capacity reduction plan for National Airport because activation of the proposal would jeopardize the availability of landing and take-off "slots" at Washington National for the envisioned nonstop service between there and New Orleans. Also, a member of Delta's Federal Affairs staff in Washington explained the basis for Delta's position to Senator Russell Long's office.

The importance of Washington National Airport to the airlines and to the 3,000 or more passengers who use its convenient facilities daily cannot be overlooked in the quest for extension of the nonstop perimeter favored by New Orleans and Delta. For example, Delta operates 10 heavily booked 137-passenger 727-200 daily roundtrips between Atlanta and Washington National and seven high load factor 727-200 daily roundtrips between Boston and National Airport. The 727-200 is the largest aircraft allowed at Washington National.

The Honorable Ernest M. Morial
Page 2
May 20, 1980

A reduction of capacity by 18%, as proposed by the FAA, undoubtedly would mandate cancellation of some of these services.

We look forward to a continuation of the excellent relationship between your office and Delta Air Lines.

Respectfully,

David C. Garrett, Jr.
David C. Garrett, Jr.

M. CALDWELL BUTLER
3000 Connecticut Avenue, N.W.

MEMBER
COMMITTEE ON THE JUDICIARY
SUBCOMMITTEE ON
GOVERNMENT OPERATIONS

WASHINGTON OFFICE
400 Capitol Square, Suite 200
Washington, D.C. 20515
(202) 555-4421

Congress of the United States
House of Representatives
Washington, D.C. 20515

June 12, 1980

LEGISLATIVE SERVICE OFFICE
901 U.S. Post Office and Courthouse
Building
505 Capitol Street
Washington, Virginia 22039
(703) 555-1274

111 Federal, Building and Post Office
500 S. Wilson Avenue
P.O. Box 1045
Washington, Virginia 22039
(703) 555-7733
(In Washington, D.C. for delivery to the

400 Federal, Building and Post Office
and U.S. Courthouse
510 W. Franklin Road
P.O. Box 500
Washington, Virginia 22039
(703) 555-5223

The Honorable Glenn M. Anderson
Chairman
Subcommittee on Aviation
Room 2251 Rayburn House Office Building
Washington, D. C. 20515

Dear Glenn:

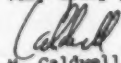
I am greatly concerned that the proposed FAA policies for Washington National Airport could alter substantially the historic role of that airport in meeting the transportation needs of air travelers in nearby states for ready access not only to Washington but more importantly to connecting flights to other points in the eastern United States.

Present FAA policy recognizes the limitations of Washington National and accords priority to short and medium haul service to communities in nearby states. I consider this most sensible. If policy changes must be made to reduce noise and provide guidance for future development, in my opinion this should be done in such a way as to preserve the level of service to communities in nearby states. I am strongly opposed to any policy change which would, in effect, make Washington National simply a third competing airport in the Washington metropolitan area rather than the present special purpose airport dictated by National's obvious limitations.

I understand that the Aviation Subcommittee is in the process of holding hearings on the proposed FAA policy. I request that this letter and the enclosed statement be made a part of the record of these hearings.

Thanking you for your consideration of my views, I am

Very truly yours,



M. Caldwell Butler

Enclosure

STATEMENT OF CONGRESSMAN M. CALDWELL BUTER BEFORE
THE AVIATION SUBCOMMITTEE OF THE COMMITTEE ON
PUBLIC WORKS AND TRANSPORTATION

I welcome this opportunity to express my concern over the proposed policies of the FAA which would drastically reduce service at Washington National Airport.

The Sixth Congressional District of Virginia has a particularly strong interest in insuring that National Airport continues to provide access to the short haul carriers providing service to communities in nearby states inasmuch as four different airports in my district -- Lynchburg, Staunton, Hot Springs and Roanoke -- could be affected by any policy that has the effect of reducing the number of flights available to short haul users. These communities are substantial users of air transportation. Moreover, Piedmont Airlines which currently serves all four and has a long and enviable record for pioneering air service to communities in nearby states would be greatly affected.

The heavy dependence of these four communities on good service to Washington is evidenced by the fact that they generate over 500 passengers a day to Washington National Airport. Indeed, at the first three cities, Washington National traffic alone amounts to over three-fifths of the total traffic at the city.

Service to Dulles or Baltimore-Washington International Airport will not meet the service needs of these Virginia cities. The ground time at these airports would be more than double the air time. Moreover, these four Virginia cities have twice as many connecting passengers as local passengers and Washington National is the only airport that provides an adequate number of connecting

services. Because of the importance of Washington National service, air travelers from these Virginia cities are seriously concerned about a proposal by the FAA which would sharply reduce the overall slots at Washington National, without preserving service for nearby cities.

I am also concerned about proposals that are being circulated both at the FAA and the CAB to allocate slots between air carriers on the basis of an auction. An auction would always favor big long-haul markets generating large revenues, as compared to shorter markets which inevitably generate less revenue per flight. An auction system would soon convert Washington National from a short-haul to a long-haul airport and this would be accomplished at the expense of service to nearby cities.

Given the finite capacity of Washington National, its logical role ought to be to provide short and medium-haul air service to nearby cities and to provide connections for passengers from these cities to other destinations. This requires that the existing services from these cities be maintained, even if overall slots are reduced and even if a new method of allocating slots between carriers such as a multi-tier (long haul--medium haul--short haul) system is used.

Whatever formula for slot allocation is used, it is of prime importance that priority be accorded nearby cities in order to preserve and maintain Washington National as the short haul airport for the nation's capital.

ROBERT W. DANIEL, JR.
4TH DISTRICT, VIRGINIA

COMMITTEE
ARMED SERVICES
DISTRICT OF COLUMBIA

THAD S. MURRAY
ADMINISTRATIVE ASSISTANT

Congress of the United States
House of Representatives
Washington, D.C. 20515

CONSTITUTIONAL CHARTER OFFICE
ROOM 119, FEDERAL BUILDING
PENTAGON, VIRGINIA 22204
202-541-0227
Room 202, Post Office Building
Pentagon, Virginia 22204
202-750-0244

May 30, 1980

The Honorable Glenn M. Anderson
Chairman
Subcommittee on Aviation
House Committee on Public Works and Transportation
Room 2251 Rayburn House Office Building
Washington, D. C. 20515

Dear Mr. Chairman:

By this letter I wish to file a statement for the hearings you are to hold on June 11 regarding the FAA's proposals for Washington National Airport. As you know, there is widespread opposition to these proposals which would impose greater restrictions on Washington National.

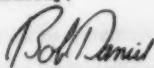
Washington National already is heavily restricted; reducing daily scheduled air carrier operations by 18 1/2%, or 118 slots, will restrict it unnecessarily and without benefit to the traveling public. It is not as if the FAA were attempting to stem an onslaught of more and more scheduled operations. To the contrary, annual scheduled operations have declined over the last twenty years, from 230,000 in 1959 to 207,000 in 1979. As to the noise problem often associated with Washington National, the newer aircraft coming into service promise significant progress in noise abatement.

My constituents, like millions of other Americans, will be inconvenienced if these rules go into effect. Norfolk International Airport serves 1.3 million people in Virginia and North Carolina. Military personnel from the Norfolk Naval Base, the world's largest, rely on this airport when their duties require them to travel to the Pentagon. The annual O & D in the Norfolk - Washington market is over 100,000 passengers, with another 200,000 on line and connecting passengers through Washington National. The Norfolk Port and Industrial Authority estimates that one fourth of passengers now flying to Washington for business would elect to drive if forced to use Dulles.

The above are some of the very compelling arguments against the FAA's proposals. I hope that they will be taken fully into account.

With kind regards.

Sincerely,



Robert W. Daniel, Jr.

STATEMENT OF THE HON. JOHN J. DUNCAN BEFORE THE HOUSE AVIATION
SUBCOMMITTEE, JUNE 12, 1980.

MR. CHAIRMAN,

THANK YOU FOR THE OPPORTUNITY TO APPEAR THIS MORNING TO MAKE A BRIEF STATEMENT CONCERNING THE FEDERAL AVIATION ADMINISTRATION'S PLAN FOR WASHINGTON NATIONAL AIRPORT. IN SUM AND SUBSTANCE, I AM OPPOSED TO THE PROPOSAL AS IT STANDS AT THIS POINT.

AS YOU MAY KNOW, I REPRESENT KNOXVILLE, TENNESSEE, WHICH IS, BY AIR TRAVEL STANDARDS, A MEDIUM SIZED CITY. IN ORDER FOR KNOXVILLE AND SIMILARLY SITUATED CITIES TO RECEIVE FIRST RATE AIR SERVICE, IT IS IMPORTANT THAT THE NUMBER OF SLOTS AT NATIONAL AIRPORT NOT BE REDUCED. THE PLAN BEING CONSIDERED CALLS FOR AN 18.1/2 PERCENT REDUCTION AFFECTING 105 CITIES CURRENTLY WITH DIRECT SERVICE TO WASHINGTON NATIONAL. IT IS LIKELY THAT KNOXVILLE WOULD FALL INTO THIS CATEGORY. YOU CAN UNDERSTAND MY CONCERN BY NOTING THE CASE CITED BY MY GOOD FRIEND FROM TENNESSEE, MARILYN LLOYD BOBQUARD. HER HOMETOWN OF CHATTANOOGA HAS BEEN SO SEVERELY AFFECTED THAT IT IS DIFFICULT TO GO ANYWHERE WITHOUT MAKING SEVERAL STOPS. IN FACT, DELTA IS THE ONLY MAJOR AIRLINE LEFT IN CHATTANOOGA AS A RESULT OF DEREGULATION. I DO NOT WANT KNOXVILLE TO BE AFFECTED IN THE SAME WAY.

THIS PLAN DOES NOT RECOGNIZE THAT OVER THE YEARS THERE HAS BEEN A NET REDUCTION OF FLIGHTS SERVING WASHINGTON NATIONAL. CARRIERS ARE HAULING MORE PEOPLE, AND THE PLANES ARE QUIETER THAN THEY USED TO BE. I DO NOT THINK THAT THIS PLAN TAKES THESE FACTORS INTO ACCOUNT. I RECOMMEND THAT THE PROPOSAL BE WITHDRAWN AND REDRAFTED TO REFLECT BETTER THE NEEDS OF THE FLYING PUBLIC. SEVERAL ALTERNATIVES HAVE BEEN OFFERED AND SHOULD BE CONSIDERED INSTEAD OF THE FAA PLAN. THERE ARE WAYS OTHER THAN SERVICE REDUCTION THAT WOULD ENABLE US TO CONFRONT THE PROBLEMS AT HAND. I ENCOURAGE THE MEMBERS OF THIS SUBCOMMITTEE TO LEND THEIR CONSIDERABLE EXPERTISE TO THIS ENDEAVOR.

THANK YOU.

STATEMENT OF CONGRESSMAN DANTE B. FASCELL, 15th DISTRICT, FLORIDA, TO THE
SUBCOMMITTEE ON AVIATION OF THE HOUSE PUBLIC WORKS AND TRANSPORTATION
COMMITTEE

JUNE 11, 1980

Mr. Chairman, I appreciate having this opportunity to comment on the Federal Aviation Administration's proposed rules governing Washington National Airport.

The proposal would, in part, reduce the number of flights at Washington National by 20%. While I understand no decisions have yet been made as to which flights would be eliminated, I want to be on record strongly opposing any reductions of flights to Florida and, particularly, to Miami.

Tourism is one of the mainstays of the South Florida economy. Any reductions in flights to the area can only have an adverse effect on this multi-faceted industry. Tourists fly from Washington to South Florida not only to enjoy all we have to offer there, but to make connections with cruise ships sailing from Miami and Ft. Lauderdale and with continuing flights to all of Latin America. Reduction of flights can only result in schedule changes that would greatly complicate these connections, thereby causing inconvenience to passengers and loss of business for the tourist industry.

In addition to being a tourist mecca, South Florida is already a primary gateway to Latin America and a multitude of businesses have been established in the community for this reason. The triangle of business and government activities necessitating flights between Washington, Miami and Latin America has mushroomed and it is essential that the current level of flights be maintained to serve this very large business community.

Last year, nearly half a million passengers were served by the nine daily non-stop flights and the three daily one-stop flights currently operating between Washington National and Miami. This is clear indication that the need

exist; and that the present levels of service must be maintained.

As one who travels between Washington and Miami weekly and sometimes even more frequently, I can testify from personal experience that these flights operate at full or nearly full capacity most of the time. Particularly in the winter months it is often very difficult, if not impossible, to obtain a seat without reservations made long in advance.

Another part of the FAA proposal would permit the utilization of two- and three-engine wide-body aircraft at Washington National. I support this aspect of the proposal since I believe it should be the individual carrier, and not the FAA, which determines the type of aircraft it wishes to use, presuming that the necessary service and gate facilities are available at the airport. It is conceivable that the use of these larger aircraft could result in a reduction in flights on a voluntary basis by the airlines, since a greater number of passengers could be accommodated by one flight. This is a far more preferable way to operate, it seems to me, than to arbitrarily mandate flight reductions.

The Greater Miami Chamber of Commerce has contacted the FAA expressing its opposition to any proposal which would reduce flights between Washington and Miami. I would like to include that communication with this statement for the record. (Attachment).

Washington National Airport is unique in that it serves our nation's capital. It is almost embarrassing how difficult it sometimes is for many Americans to get here from various parts of the country. The service to and from Washington must be improved or, at the very least, maintained, rather than reduced.

Mr. Chairman, once again, I appreciate having this opportunity to express my views on this very important matter of concern to my congressional district. I support your investigation of the proposed rule and feel confident that you will take whatever action is necessary to maintain a high level of service for those who depend on it.

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

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FEDERAL AVIATION ADMINISTRATION

OFFICE OF CHIEF COUNSEL

800 INDEPENDENCE AVE

WASHINGTON DC 20591

ATTN RULES DOCKET AGLOB

REGARDING FAA NOTICE 88-2, WE ARE OPPOSED TO REDUCING THE SERVICE FROM MIAMI TO WASHINGTON NATIONAL AIRPORT. CONTINUATION OF EXISTING SERVICE IS VITAL. ANY REDUCTION IS COUNTER PRODUCTIVE TO MIAMI BUSINESS TRAVEL AND THE ECONOMY OF DADE COUNTY

R RAY GODDE PRESIDENT GREATER MIAMI CHAMBER OF COMMERCE

19122 EST

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PREPARED STATEMENT
of
HON. JON HINSON
UNITED STATES HOUSE OF REPRESENTATIVES
before the
SUBCOMMITTEE ON AVIATION
of
THE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
UNITED STATES HOUSE OF REPRESENTATIVES
WASHINGTON, D.C.
(June 11, 1980)

Mr. Chairman, Members of the Subcommittee: I welcome this opportunity to present my views on the Federal Aviation Administration's proposed policy for operations at Washington National Airport. The proposed policy changes are centered on the Department of Transportation's desire to move some of the Washington National traffic to Dulles International Airport or Baltimore-Washington International. I feel that substantial amounts of public service between Washington and other communities could be adversely affected if this proposal is adopted, and I would like to express my opposition to the unnecessarily restrictive and regressive rule changes being proposed.

The FAA proposal will reduce scheduled daily air carrier operations by 18 1/2 percent, or 118 slots, from the current 640 to 522. Such a

reduction would mean that approximately 5,000 or more passengers daily would be either shunted off to another airport or simply not accommodated. This could impact service from any of at least 39 states and 105 cities which currently have direct scheduled service to and from Washington National. As Representative from the Fourth Congressional District of Mississippi, I am particularly concerned over the devastating effect which these policy changes would have on air travelers from the South. The city of Jackson is the largest city in my District and the State as well, housing the only international airport in Mississippi. At the present time, Washington is Jackson's 7th largest air passenger destination city with a 1978 origin and destination count of 28,650. Most of these passengers fly in and out of Washington National Airport, which is very conveniently located for easy access to most downtown areas. Diverting much of this traffic to Baltimore and to Dulles International will be a great inconvenience to Jackson travelers, and a curtailment of airline operations at Washington National Airport could seriously jeopardize existing and future services to various Southern cities.

Washington National Airport has been an important transportation center since it opened in 1941. It is attractive to air travelers because of its convenient, close-in location which has been enhanced with the operation of the METRO rapid transit system at the airport. While it may be desirable to increase the use of Dulles International and Baltimore-Washington International and to meet the environmental complaints being made, I believe it is important to take into account

the vital contributions of National Airport to the commerce of this area and its role as a crucial link to the seat of the Federal Government. In my opinion the airlines have been most responsive to any environmental complaints; they have developed newer and quieter aircraft and special noise abatement operating procedures. Furthermore, the airlines seem more than willing to develop a more feasible and mutually beneficial restructuring plan, whereby meaningful noise relief can be achieved with fewer disruptions in the Nation's air transport system.

As a cosponsor of legislation expressing the sense of the House that the Department of Transportation or the Federal Aviation Administration should not reduce public air service into Washington National Airport, I urge that every effort be made to reject the current proposed regulations contained in Dockets 19948, 19950 and FAA Notice #80-2. As an advocate of allowing the marketplace to dictate the level of service to be provided, I caution against encumbering federal restrictions which will frustrate the basic purpose of airline deregulation--which is to provide the necessary airport and airway capacity to respond to public demand. The traveling public has made clear its desire and need of Washington National Airport, and I believe that their viewpoint should be given every consideration.

Remarks of Congressman James R. Jones before the Subcommittee on
Aviation, Committee on Public Works and Transportation, on the De-
partment of Transportation's Proposed Policy for Metropolitan Wash-
ington Airports

June 11, 1980

Mr. Chairman, I appreciate this opportunity to present my views before this Subcommittee. The issue before you is an important one, and I know you will give it the thorough consideration it deserves.

I was distressed, Mr. Chairman, when I heard about the policy for Washington National Airport which the Department of Transportation has proposed. If the rules are enacted, 110 flights a day would be cut from scheduled air carrier service. A severe cut in operations such as this could result in a loss of air service between the First District of Oklahoma and Washington, D.C.

Several ramifications of this proposal concern me particularly. As this Subcommittee knows, there is not adequate mass transit from Dulles airport to Washington. The extra passenger load which is shunted off to Dulles airport will then waste fuel, time and money in transit to the District.

The smaller or medium sized communities which depend on service to Washington National Airport may shoulder an undue share of the burden. Since airline deregulation, many of these communities are struggling to survive and are fighting for service into National Airport. I do not think we should take action which could tip the balance against them.

I am also concerned that these rules will reduce service between Washington and Oklahoma's First District. When my constituents come to Washington, they want to land near the city, not miles

away at Dulles without adequate mass transit. National Airport is connected with Washington through our fine subway system. An arriving passenger, in many cases would not need to have a car available to him. The Metro system can take him to nearly all of the major hotels and tourist attractions in and around the District. The same cannot be said for a passenger arriving at Dulles.

I support the proposal made in the letter to Secretary Goldschmidt, which I signed with Representative Bouquard and others of my colleagues. It makes more sense to develop Dulles as a viable alternative than to arbitrarily cut off essential service at the major airport of our Nation's Capital. Dulles could become viable, I feel, with research and development of adequate mass transit. However, until that is accomplished, I feel it would prove detrimental to allow these rules to be enacted.

Mr. Chairman. I appreciate the opportunity to express these views before you, and I hope this Subcommittee will not permit this unwarranted, unnecessary and unwise action to take place.

WALTER S. JONES
107 DAVENPORT, NORTH CAROLINA
TELEPHONE CODE 252: 252-2124

Congress of the United States
House of Representatives
Washington, D.C. 20515
June 4, 1980

FLOYD J. LUTTON
ADMINISTRATIVE ASSISTANT

COMMITTEE
AGRICULTURE
MERCHANT MARINE
AND FISHERIES
JUN 5 9 21

RECEIVED
GLENN M. ANDERSON
MEMBER OF CONGRESS
WASHINGTON OFFICE

The Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation
House Public Works and Transportation Committee
2251 Rayburn House Office Building
Washington, DC 20515

RE: Notice of Proposed Policy, D. 19950
Notice of Proposed Rulemaking, D. 19948

Dear Mr. Chairman:

May I respectfully bring to your attention my concern over the above subjects and their ultimate affect upon smaller airports located within a 300-mile radius of Washington. It is quite apparent that these proposals would in fact reduce service at the Washington National Airport.

I have three small airports located in or near my congressional district, one of which I utilize personally and involves the Kinston, North Carolina, Eastern Regional Jetport. All of these terminals are served by smaller aircraft such as those utilized by Piedmont Airlines, Inc. and by Commuter Service. The Kinston and Jacksonville, North Carolina, airports serve three major military installations, including Seymour Johnson Air Force Base, the U.S. Marine Corps Air Station, Cherry Point, and the Camp Lejeune Marine Complex. The reduction of service at Washington National Airport will seriously impair, not only the military, but thousands of air travelers annually by any reduction in service.

The service to Kinston, North Carolina, is already at the minimum service level and the above FFA proposals would reduce our service frequency below acceptable levels, thereby producing a major impact on the service quality. This would also result in the smaller cities within the 300- to 500-mile radius losing service to the Nation's Capital, which we can ill afford.

In the event we are considering a safety factor, then it would appear that the major airlines presently utilizing Washington National Airport could be converted to Dulles, thus permitting ample slots on a daily basis for the smaller aircraft serving small communities across the eastern part of the United States and elsewhere. I feel very strongly that the smaller airlines should be given consideration if and when any changes are made in the present assignment of aircraft to Washington National Airport.

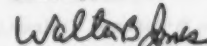
The Honorable Glenn M. Anderson, ..Page 2

June 4, 1980

The Eastern Regional Jetport, Kinston, North Carolina, serves approximately 700,000 citizens. It is in their behalf that I appeal to your committee to protect the minimum service which we presently enjoy.

With best personal regards, I am

Sincerely,



WALTER B. JONES
Member of Congress

WBJ:Lvm

Paul H. Lee
11.4.33

Mr. Chairman:

I appreciate the Subcommittee's courtesy in permitting me to make a statement in regard to a pending proposal of the Federal Aviation Administration which would reduce operations at Washington National Airport. I shall state my thoughts briefly.

This proposal is a matter of deep concern to me and the 33rd Congressional District of New York, which it is my privilege to represent. In a nutshell, FAA is proposing immediately to reduce the number of permissible airline flights by 118 each day at National Airport. FAA is also considering an 18 million annual passenger limit for the airport and extending the so-called perimeter rule from 650 to 1000 miles. It is hard to read these proposals to mean anything but further reductions in service in the near future. FAA also plans to shorten the hours of operations at National Airport. If the FAA proposal is adopted, airlines would not be allowed to schedule a flight after 9:30 PM and the airport will be closed to all users, airline, commuter and general aviation, at 10:30 PM.

As I see it, changes in operating policy such as these will have a significantly adverse impact on air service to a number of communities in the State of New York and throughout the nation. On its face, the proposal would take its toll of a number of important existing public services on which American citizens, including citizens of the State of New York, depend on traveling to and from Washington. The 9:00 PM shuttle from LaGuardia to National Airport immediately comes to mind as one of the first casualties.

As all of us know, many communities in the nation, especially small and medium-sized ones like those in Syracuse, Elmira, Binghamton and Ithaca, and Rochester, New York, have experienced a loss of airline service since the Airline Deregulation Act became effective and some airlines discontinued service to such communities in order to implement more profitable routes. The airport at Syracuse which serves most of the 33rd District, has experienced a substantial withdrawal of service to many markets by the airlines which had served it for many years. Although some of the demand of the community for air transportation

is being met by commuter carriers, the area has already suffered both economically and in terms of travel convenience as a result of this diminution of service. Certainly Washington is a major area to which we would like to re-establish direct service. Needless to say, it will be almost impossible to recapture any certificated service to Washington National if the number of flights allowed are reduced.

I am deeply concerned, Mr. Chairman, that the FAA proposal to reduce air service to Washington National Airport will have a severe adverse impact on the business travellers from Syracuse, and the entire Central New York region. This proposal will increase the cost of doing business by requiring overnight stays for trips that now can be accomplished in one day. In effect, Mr. Chairman, the business located in New York State will suffer economically because of this proposal.

I understand that several alternatives to FAA's proposed rule have been advanced, although I am frankly not familiar with the details of any of these proposals. However, I am sure that FAA could address some of the problems at National by methods other than reducing public service. I feel very strongly that FAA is on the wrong track, a feeling I assure you is shared by the residents of my district. I believe that the FAA proposal should alarm all of the nation's communities currently enjoying airline service to Washington National Airport and those who have already lost service and are trying to get it back.

It should also concern those who fly their own planes or at times ride as passengers in private planes. Many non-jet airplanes currently are able to fly in or out of National in late evening or early morning, free from the congestion of the larger aircraft. Closure of the airport as proposed would preclude this alternative.

In conclusion, Mr. Chairman, I would like to urge the Subcommittee to take all appropriate steps to prevent the needless reduction of important public service to the only airport readily accessible to the seat of our Federal Government.

Thank you, Mr. Chairman, for the Committee's indulgence.

WILLIAM LEHMAN
12th District, Florida

COMMITTEE
APPROPRIATIONS

ADMINISTRATIVE ON
PERSON OPERATIONS
ADMINISTRATIVE ON
TRANSPORTATION

Congress of the United States

House of Representatives 100 AN - 5 AN 9 27

Washington, D.C. 20515

June 4, 1980

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RECEIVED
GLENN M. ANDERSON
WASHINGTON OFFICE

Honorable Glenn M. Anderson
Chairman
Subcommittee on Aviation
2251 Rayburn HOB

Dear Glenn:

Your decision to hold hearings on the FAA's proposed rule on Washington National Airport is commendable. It is very important that we continue to discuss the potential impact of more restrictions on flights to and from National.

Many of my constituents make frequent business trips from Miami to Washington and the importance of the convenient location of National Airport cannot be overemphasized. The frequency of flights permits these persons to avoid overnight stays and to make the best use of their valuable time.

In addition to this very practical consideration, I am concerned that such restrictions are contrary to our recent efforts to deregulate the airline industry. The freedom of air carriers to provide service where needed should not be hindered due to reasons which are not related to safety.

I have long advocated reductions in aircraft noise. I believe, however, that the quieter aircraft of the future will provide the necessary relief. We should not risk the disruption of our air transportation system, in which Washington National Airport plays such an important role.

With best wishes, I am

Sincerely,

Bill
WILLIAM LEHMAN
Member of Congress

WL/mar

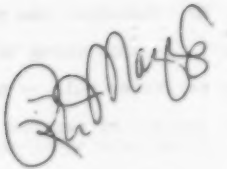
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RECEIVED
GLENN T. ANDERSON
MEMBER OF CONGRESS
WASHINGTON OFFICE

STATEMENT OF

CONGRESSMAN ROMANO L. MAZZOLI



Mr. Chairman and Members of the Subcommittee, the Federal Aviation Administration's (FAA) recently announced proposal to change certain procedures at Washington's National Airport are of concern to me and the residents of the Third Congressional District in Kentucky.

Washington is Louisville's fourth largest market, with 87,670 passengers last year either having Washington as their destination point or transferring here to go on to another point. For over 80% of these passengers, Washington was their destination spot. Consequently, any changes at National directly affect service to my constituents.

The FAA is proposing to change the allocation of hourly operations at National. This will reduce the air carrier category allocation -- or slots -- from 40 to 36. The FAA also is proposing to reduce the number of hours that the airport will be open to scheduled operations. The projected effect of these two actions would be a reduction of 18.6% of the air carrier slots per day.

The proposal also would expand the 650-mile perimeter rule to 1,000 miles. The original purpose of the perimeter rule was to maintain National Airports's local character and its short and medium haul role. If this aspect of the proposal is adopted, air flights originating within the 1,000 mile zone will be landing at Dulles and the commuter-market nature of National will be all but destroyed.

Mr. Chairman, the proposed changes -- the reduction of "slots", the shortening of operational hours and the expansion of the perimeter rule -- may result in a significant decrease in the quality of service to many communities, including my own.

I request that a careful review be given to the FAA proposal before acting on it.

Congressman G. V. Montgomery
Subcommittee on Aviation
June 12, 1980

Mr. Chairman, I am pleased to have this opportunity to express my strong opposition to the Department of Transportation proposal to limit flight services into National Airport. Mrs. Bouquard is to be commended for her effective leadership in this battle with the Federal Aviation Administration, and I am very supportive of her efforts. I would like to urge this Subcommittee to give serious consideration to a reversal of these proposals.

During the 95th Congress our vote to deregulate the airlines was a great disservice to the small and medium sized cities in this nation. These cities, having lost service due to Public Law 95-504 are the very ones that will feel the greatest impact from service cutbacks at National. With fewer flights allowed, we would likely see fierce competition for the remaining slots. The smaller airlines that came to the rescue of these smaller communities would most likely lose in the push; thus our small/medium sized cities stand to lose even more of their airline service, or, at best, be forced to land at Dulles with no rapid access to the city.

I would like to suggest that these FAA proposals are very premature. Dulles was built to divert traffic from National, but it is my understanding that since the location was so far from the city, a rapid transportation system was to be part of the package. Until such a system is part of Dulles, taxpayers flying into their capitol city should not be subjected to the unnecessary inconvenience of little choice but a slow journey into the city. Many of these passengers are business people who are under time constraints and need ready access to the District of Columbia.

Congressman G. V. Montgomery
Statement on FAA Proposals for National Airport
Page Two

Certainly the Members of Congress and our government employees who travel extensively with their jobs require such rapid access and I fail to hear arguments against the current amount of traffic at National Airport that are convincing enough to justify the inconvenience of a large number of daily airline passengers. I would suggest to the Department of Transportation that they should first direct their efforts into providing adequate and speedy access to Dulles before relocating air traffic there.

Mr. Chairman, I am opposed to the regulations, and I will continue my active opposition until I am convinced that (1) our medium sized cities will not be further inconvenienced and (2) there is a high speed transit system to ferry passengers into the city from Dulles International Airport.

Thank you, Mr. Chairman.

STATEMENT OF THE HONORABLE RICHARD L. OTTINGER
SUBMITTED TO THE SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
JUNE 25, 1980

Mr. Chairman, I would like to express my virulent opposition to the Federal Aviation Administration's (FAA) proposed rule on Metropolitan Washington Airports and have several comments I would like to share with the Subcommittee.

The FAA has proposed several changes in operations at Washington's National Airport. These include: 1) An extension of National's limit on nonstop flights from the existing 650-mile limit to 1,000 miles; 2) An 18% reduction in the number of "slots" available for air carrier operations at National; 3) The use of two and three-engine widebody aircraft at National; and 4) The curtailment of all service after 9:30 p.m. It is my understanding that none of these changes are proposed for safety reasons, but for reasons of building up traffic at the other metropolitan airports and for the convenience of residents.

At present, the limit on nonstop flights in and out of National is 650 miles with the exception of seven "grandfathered" cities beyond the 650 mile radius. It seems counterproductive to extend the radius to 1,000 miles to include all other cities within that range. If anything, the radius should be decreased allowing "short-haul" service, which would enable persons conducting short-term business in the nation's capital to take full advantage of National airport's location.

The unique quality of National is its accessibility to frequent and rapid transportation to and from downtown Washington. Millions of dollars were spent to extend the Metrorail to the airport. Trains run every five minutes during rush hours and every ten minutes during off-peak hours. It only takes 25 minutes to get downtown on the subway. According to the Air Transportation Association (ATA), by the end of 1979, approximately 18% of the passengers using the airport arrived or departed by Metrorail. According to the ATA, the 18% using Metrorail is a figure based on the total number of passengers using National Airport. If the total had excluded connecting passengers, the percentage would have been much higher. The convenience of Metrorail and bus is best used by those passengers on short distance flights who want rapid transportation downtown. It would be unreasonable to force passengers to spend 60 to 90 minutes using ground transportation after a 45 minute flight as would be required under the proposed rule if these planes were required to land at Baltimore or Dulles.

The restriction of National's nonstop flight mileage radius would prevent small communities within the 650-mile range from maintaining their less profitable air services to Washington--services critical to local businesses and corporations. In my District, for example, I have been informed that the three daily Air Florida flights between White Plains and Washington would be terminated "in all likelihood" because of the pro-

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tic reduction of slots available at National. The proposal to strictly limit the allotment of slots at National's National Airport would also greatly hamper the shuttle service. Under the existing regulations, the shuttle is able to operate unscheduled flights in a single slot which demand requires. If slots were strictly issued as proposed, the shuttle would lose the flexibility upon which it has been suggested that should the FAA's proposal prevail, shuttle service between Washington and New York would have to be terminated. This would result in the loss of a service that handles approximately 1,820 passengers daily, which is essential to the economic health of both cities. The shuttle would encourage the use of the quieter two and three engine turboprop aircraft over short distances, but only provided that all safety precautions have been addressed. New aircraft like the A300 would allow the same number of passengers to benefit from National's convenient location. The number of arriving and departing aircraft would be reduced. I understand, however, that the Airline Pilots Association has registered strong objections to the safety of operating these planes at National, and in no event should safety be sacrificed to schedules or convenience. Finally, the ATA, on behalf of 15 major scheduled airlines, has requested a rather complex but more useful revision of the slot quotas which would permit even fewer weekly operations than those proposed by the FAA. Its proposal would provide more

slots for certificated air carriers and commuter lines while limiting general aviation slots. Certainly it is an outrage to limit scheduled carriers carrying hundreds of passengers each for the sake of accomodating private aircraft that carry only one to a dozen passengers. The ATA would also allow 18 operations between 9:00 p.m. and 9:29 p.m. and 18 operations between 9:30 p.m. and 9:59 p.m.. The ATA's proposal would thus eliminate the problem of having 40 flights scheduled at 10:00 p.m. without the more drastic measures proposed by the FAA. This would allow for more commuter slots during the last hour, making it easier for businessmen to make one-day trips to Washington.

In conclusion, I feel strongly that in the FAA's attempt to propose a long-range plan for Washington's metropolitan airports, planners must focus, within the limits of safety, on the increasing numbers of persons flying to Washington on scheduled carriers who depend on National Airport's convenient location and its accessibility to rapid public transportation. All efforts must be made to maintain the levels of service which National provides to short-haul, commuter-oriented traffic.

I deeply appreciate the Subcommittee's consideration of my thoughts on this critical issue.

RICHARDSON PREYER
SIXTH DISTRICT, NORTH CAROLINA
WRITTEN TESTIMONY BEFORE THE AVIATION SUBCOMMITTEE
HOUSE PUBLIC WORKS COMMITTEE
JUNE 12, 1980

Mr. Chairman, I appreciate the opportunity to share with the members of this Subcommittee my concern about proposed changes in the operations for Washington National Airport. While I can appreciate the desirability of moving some Washington National traffic into Dulles International Airport, I believe that consideration must be given to the serious impact that such a proposal will have on the quality of existing service provided to cities in North Carolina and other cities located at a comparable distance from Washington National Airport. Service to these cities is placed in jeopardy by the proposal to reduce slots at Washington National by almost 20%, and to permit flights to new cities up to 1000 miles from the airport. These proposals would have a particularly severe impact on cities located in the nearby States of North Carolina, Virginia, and West Virginia. For this reason, I urge that the final policy incorporate a provision which preserves existing air service for nearby cities.

In my view, this provision is required for the following reasons:

1. It is essential to maintain the sound policy of using Washington National as the short haul airport for the Washington area.
2. Washington is an important destination for air passengers from nearby cities. Washington National -- the close in airport -- is the only airport which meets their needs. For most of these cities, air time to Washington is one hour or less. If because of slot restrictions the flights are transferred to Dulles or to Baltimore-Washington International Airport, the surface time is more than double. The ability to complete a one-day business trip is seriously impaired.

3. For many of the cities, Washington National has been the major connecting point to other cities throughout the Nation's air transportation system. Dulles has very few connecting flights. Connecting flights at Baltimore-Washington International Airport are also substantially fewer than at Washington National. Only service to Washington National will provide good access for connecting passengers to other major destinations beyond Washington.

4. Many of the nearby cities are relatively small and can support only two to four roundtrips to Washington National. If this service is reduced because of slot limitations, their service frequency will be forced below minimum acceptable levels. This contrasts with the big long haul markets which are served by 10 to 20 roundtrips a day. Even if the frequency in these markets is reduced by 20% or 30%, there will still be convenient, frequent service.

All of these reasons support my conclusion that a sound policy for Washington National requires a special provision preserving existing slots for nearby cities.

Thank you for your consideration.

STATEMENT
SUBMITTED
ON PUBLIC
HEARING
TRANSPORTATION
JUNE 11

Mr.
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OF REPRESENTATIVE J. KENNETH ROBINSON OF VIRGINIA
TO THE SUBCOMMITTEE ON AVIATION, HOUSE COMMITTEE
WORKS AND TRANSPORTATION, FOR THE RECORD OF A
N RE A PROPOSED POLICY OF THE DEPARTMENT OF
ATION FOR METROPOLITAN WASHINGTON AIRPORTS,
1980

ROBINSON. Mr. Chairman, I appreciate this opportunity
a short statement in connection with the Subcommittee's
tion of a proposed policy of the Federal Aviation
ation, Department of Transportation, as to future
and development of aviation services at Washington
Airport and Dulles International Airport.

former member of the Dulles International Airport
n, an agency of the Commonwealth of Virginia, I have
g-standing concern over the persisting under-utilization
ine air terminal. I support in principle, therefore,
ated intent of the Federal Aviation Administration
some of the scheduled service from Washington
Airport to Dulles. In view of the substantial
capacity presently available at Dulles, it seems clearly
d that the heavy pressure on National should be
for considerations of air safety and environmental

any shift of flight access slots to Dulles, inconvenience
ngers in the matter of time of travel to and from an
ould be minimized, on a relative basis, if the
were on movement of long-haul flights away from

An examination of the FAA proposal suggests to me, however, that existing and projected short-haul service needs at National would be disadvantaged by the access slot formula. I have in mind, in particular, scheduled air carrier service between National and points within a 300 mile radius. I cite as an example the estimate of Piedmont Airlines, a carrier which provides the only service of its class to a number of Virginia cities, that failure to maintain the current level of slots for non-stop certificated service to cities within 300 miles would result in a 47% loss of service to short-haul cities on its routes.

It also has been pointed out that the proposed admission of so-called "jumbo" jets, presumably flying long-hauls, would tighten the squeeze on short-haul service availability by quickening the approach to the planned annual passenger ceiling at the airport.

I recognize that the FFA plan includes substantial increases in slots for commuter airlines, but I question the advisability of doing this at the expense of certificated carrier service which is generating economically-acceptable levels of traffic.

In the interest of a balanced treatment of the various elements of public convenience and necessity, therefore, I urge the Subcommittee to support maintenance of at least the existing number of slots for non-stop certificated services to cities within 300 miles of Washington National Airport.

urge, further, that the Subcommittee give consideration
of insuring reliable and convenient air service
Washington National Airport and communities in the
radius when such communities are deprived of non-stop
certificated carrier service by election of the carrier to
the route. In such circumstances, the arrival and
departure slots at National thereby vacated should be reserved
for other certificated carrier willing to provide service
on the route, or, if none were to come forward, for a
commuter airline willing to provide service on a
non-stop basis, to the affected communities.
We believe that this protection for short-haul service to and
from National can be provided in a manner consistent with the
policy objectives of reducing the present dangerously excessive
air traffic pressure on that airport and making more
efficient use of underutilized Dulles.

Statement of

U.S. Senator Richard Stone

On the FAA's Proposed Rule Changes
for the Metropolitan Washington Airports

I appreciate the opportunity to submit this statement in opposition to parts of the Federal Aviation Administration's proposed rule relating to future utilization of Washington National Airport.

Florida is one of the most rapidly growing states in the nation. By the year 2,000, Florida will be the fourth most populous state in the union, behind only California, New York and Texas. This tremendous growth is reflected in the increase in air travel to and from Florida. The only new major air carrier airport currently being built in this country -- the Southwest Regional Airport -- is under construction near Fort Myers. Many of our other airports are facing expansion too, due to increased passenger demands. And worries about the availability and cost of gasoline have resulted in an even greater shift to airplanes as the means of reaching our state.

Air travel is obviously very important to the State from a tourism standpoint (the tourism industry is far and away our biggest industry) and to our many residents seeking ease of access to other cities. It is with this background that I approach the latest FAA proposal for one of the nation's most important airports.

Shortly after Secretary Goldschmidt took office, he called National Airport a "dump" and a "disgrace." As a frequent user of that facility, I can appreciate his sentiments. Changes need to be made at National to improve the access and passenger handling and to ease the noise, particularly at certain hours, but I am not convinced the FAA proposal is the best way to achieve these goals.

There are approximately 90 operations a day between Florida and National Airport (roughly 45 round-trips) between nine Florida cities. Recent figures

show over a million and a half travelers between these cities and Washington a year. Thus, Florida accounts for a sizable amount of the total passengers utilizing the airport (roughly 15 million used Washington National last year) and for a good number of the 640 available daily slots. A nearly 20 percent reduction in available slots, through the combination of reducing the hours during which flights can be scheduled and reducing the number of air carrier slots per hour, could have a significant and detrimental effect on air travel between Washington and Florida.

Washington National is really the only convenient airport for business travelers to and from the Capital. While the physical structures of Dulles and Baltimore-Washington International are much more pleasing, there simply is no fast, convenient transportation between those airports and downtown Washington. This problem must be tackled before any significant diversion of travelers will take place.

It is difficult to judge how many flights would actually be eliminated if FAA's plan went into effect, but I can imagine that some flights would not be moved to one of the outlying airports. For some smaller airlines, the cost of maintaining a presence at the several different airports would be too great. And it would be service to smaller cities that would most likely disappear. Whether such service would or could be replaced by commuter service is arguable.

I also question the need to place an arbitrary cap on the number of passengers handled at the airport. The objective should be to get the maximum use of the airport consistent with ease of passenger handling and appropriate noise levels. A natural limit will be reached at some point once the necessary airport improvements are made and if it is not, then a limit could be considered at some later date. I can see the value of a temporary limit

during the time that construction is underway at the airport.

It was the ground problems that really prompted the Secretary's unflattering assessment of the airport. Dick Judy, the airport manager at Miami International, has some good suggestions in his filing with the FAA as to ways to improve the situation at National. Certainly the central problems of poor road access to the terminal, arriving and departing passengers and visitors crowding the same areas, poor access between the North and the Main Terminals and difficult access to the subway, must be addressed head-on rather than indirectly through capacity constraints.

Noise abatement has been given as one reason to adopt the FAA plan. As one who lives near Washington National, I am not unsympathetic to the need to take steps to reduce aircraft noise, particularly in the early morning and evening hours. The Air Transport Association has put forth an alternate proposal which reduces the number of air carrier operations in the morning and evening hours and increases them during the middle of the day. I would think some accommodation could be reached that is closer to the ATA proposal. Besides more flexibility in hourly slot allocation, the introduction of technologically advanced aircraft will ease the noise level at all hours.

Finally, in reference to the 1,000-mile perimeter question, I wanted to point out that some of the grandfathered cities which signed letters to the FAA in favor of the 1,000 perimeter did not realize that it was proposed in conjunction with a reduction in the number of daily slots. If adopted, these proposals would mean more competition for fewer available spaces, thus making it even more difficult for the grandfathered cities to maintain their current level of service into Washington National.

STATEMENT OF THE HONORABLE G. WILLIAM WHITEHURST
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION
SUBCOMMITTEE ON AVIATION

JUNE 11, 1980

Mr. Chairman and Members of the Subcommittee:

Thank you for the opportunity to offer this testimony regarding the Federal Aviation Administration's proposed changes to the policy affecting Washington National Airport. Let me state at the outset that I strongly support a continuance of the status quo at Washington National Airport. If the changes in policy proposed by the FAA are implemented, it will create absolute commuting chaos between my district of Norfolk and Virginia Beach, Virginia, and the Nation's Capital.

As I am sure you are well aware, the Second District of Virginia has an extremely large military and federal presence. For years, it has been a constant struggle to provide sufficient air service for our many federal and military personnel to and from Washington where so much of their work emanates. When the new deregulation guidelines went into effect, Norfolk International Airport once again had to demonstrate to the major airline carriers that there was sufficient passenger demand to and from Washington, and other points, for them to justify providing service. The demand has shown that the business is there and will be there for many, many years to come.

Now my Congressional District faces a drastic reduction, if not elimination, of service by major airline carriers from Norfolk International Airport to Washington National Airport. The consequences of this happening are enormous, both in economic terms and the serious disruption it would have on business.

At present, there are seven flights daily from Norfolk to Washington National Airport provided by Piedmont and U.S. Air. Washington is the second largest market to which travelers from Tidewater fly, second only to New York City with some 200,000 passengers flying to Washington each year. Equally important is the fact that Washington National Airport is a connecting point for these travelers to complete their trips to other cities. Last year, of the 200,000 persons traveling from Norfolk to Washington in both directions, about 80,000 of them used Washington National Airport as a connecting airport. For example, U.S. Air's flights from Norfolk to Washington continue on to such places as New England, Upstate New York, and Detroit. If the Norfolk-to-Washington link is severed by U.S. Air, Norfolk stands to lose direct service elsewhere because U.S. Air will utilize its aircraft in other markets.

Under the proposed changes in the Washington National Airport policy, Norfolk International Airport faces a very real possibility of being totally squeezed out of the commercial air traffic picture and being relegated to a market in which travelers to Washington National Airport will be accommodated only by commuter and general aviation flights. I submit this would place an undue hardship on the thousands of people in my district who depend on reliable air service to and from Washington to conduct their business, both in the Private and public sectors.

By reducing daily air carrier operations by 18½ percent, or 118 slots, from the current 640 to 522, there is no question in my mind that this scenario will develop: The major airline carriers will look at their ledgers and note that although the passenger volume between Norfolk International Airport and Washington National airport is there, they will decide that greater revenues could be generated by assigning slots now assigned to Norfolk to other more distant markets. Norfolk International Airport, therefore, will fall victim to a system which places more significance on distance than it does on passenger volume.

It is inconceivable to me that any attempt to relegate Norfolk International Airport to a commuter service market for Washington is in the best interests of anyone. It simply won't work. As it is, it is very difficult to get space on a commuter flight now. In order to meet the present demand with commuter flights, it would be necessary to have four or five commuter planes flying in formation each morning from Norfolk to Washington. While such a formation might make a nice picture, it would not make much sense.

In addition, it is not a viable alternative to expect that those persons now traveling from Norfolk International Airport to Washington National Airport will continue making such trips if they are diverted to Dulles International Airport or Baltimore-Washington International Airport. It has been clearly shown through past experiences that the traffic does not stay--it decreases. When United Airlines decreased its service from Norfolk to Washington National Airport, a tremendous void was created and people simply stopped traveling. And if they did travel, they either stayed in Washington longer than they would have ordinarily--at substantially greater expense, or cut their trips short.

For the people of my Congressional District, Washington National Airport has always been considered a short-haul airport from nearby cities. It is an airport of convenience to those who depend on its proximity to downtown Washington for the expeditious conducting of business. To expect these same people to travel to Dulles or BWI at the same regularity is an unreasonable assumption.

As I stated earlier, I support the continuation of the status quo at Washington National Airport. In the absence of that, I urge the adoption of a special provision in any final rule reducing air carrier slots at Washington National Airport to provide for service within 300 miles of the airport, such as the one suggested by Piedmont Airlines. Specifically, that provision would require the FAA to set aside the same number of slots for non-stop certificated service to cities within 300 miles as were utilized on February 1, 1980. Under the proposal, 27 percent of the slots would be reserved for short haul service and the remaining 73 percent for long haul service. Without such a rule, Piedmont calculates that unless there is a 300-mile rule, the short haul cities served by Piedmont will sustain a 47 percent loss of service, inconveniencing 1.3 million passengers.

Thank you again for allowing me to testify on this extremely important issue, which potentially could have an extremely serious impact on the traveling and business habits of so many people in Southeastern Virginia.

10 JUN 1980

10 JUN 1980

From: Commander Naval Base, Norfolk
 To: Commander Military Traffic Management Command (MTMC-PTM), Washington, DC 20371
 Via: (1) Commander in Chief U.S. Atlantic Fleet
 (2) Commander Naval Military Personnel Command (NMPC-07), Washington, DC 20370

Subj: Possible curtailment of commercial airline service between Norfolk and Washington National Airport; information concerning

Encl: (1) Federal Aviation Administration ltr undated w/two encls (Federal Register of 21 Jan 1980, subj: FAA Metropolitan Washington Airports; Proposed Policy) and (Supplement to the Draft Environmental Impact Statement dated Jan 1980)
 (2) Remarks of the Executive Director, Norfolk Port and Industrial Authority at Public Hearings conducted by the FAA on 27 Mar 1980
 (3) Comments of the Norfolk Port and Industrial Authority submitted to the FAA on 15 Apr 1980
 (4) United Airlines ltr of 22 May 1980 w/one encl (Air Transport Association of America Position Paper with respect to proposed changes in operating procedures at Washington Metropolitan Airports)

1. Enclosure (1) outlines certain proposals currently under consideration by the Federal Aviation Administration which, if adopted, would limit the number of passenger loadings and reduce operating hours at Washington National Airport. Enclosures (2), (3) and (4) set forth the positions of the City of Norfolk, United Airlines and the Air Transport Association of America in this matter.

2. If implemented, City of Norfolk officials believe that the proposed policy will (1) eliminate about half of the Norfolk-Washington flights, (2) shift about one-fourth of all trips from air to automobile, and (3) increase the duration of each trip resulting in increased overnight accommodation requirements. Although the new regulations would increase the number of commuter flight slots at Washington National, the use of commuter flights to replace the loss of scheduled service might be unsatisfactory because of the limited passenger capacity and/or possible lack of sufficient commuter aircraft. It is also understood that every commuter flight operated by a certificated airline would count against the number of slots allocated at Washington National and would therefore simply result in a substitution of smaller passenger capacity aircraft for larger aircraft. With this restraint extant, it is highly unlikely that any certificated airline would be willing to increase their commuter flights and also highly improbable that there are sufficient commuter aircraft available to independent owners which could meet the normal demands of daily Norfolk to Washington travelers.

Subj: Possible curtailment of commercial airline service between Norfolk and Washington National Airport; information concerning

3. Every year more than 13,000 Navy-sponsored military and civilian passengers travel between Norfolk and Washington to conduct official Navy business. The majority of these trips are normally planned to conduct Washington/Norfolk business via one-day round-trip itinerary which keeps the expenditure of government travel funds to a minimum as well as minimizes the time travelers are away from their jobs. Scheduled airlines service between Norfolk and Washington National, as now available, permits daily round-trip itineraries for our people. Should our personnel be required to use the Dulles or Baltimore Airports, one-day business round-trips to Washington for Navy-sponsored passengers will become highly impracticable and result in substantially increased per diem costs to subsidize overnight berthing accommodations. In view of other recent significant reductions of DOD travel funds, any increased travel costs generated by an adverse FAA decision in this matter, coupled with the ever-present distinct possibility of significant increases in all commercial air fares, could have a devastating effect on the Navy in Tidewater. In this context the use of private automobiles with the undesirable attendant increase in energy consumption could be considered as an alternative by reason of costs and travel time to the Metropolitan Washington area.

4. In addition to the public hearings on this matter conducted by the FAA in March 1980, additional hearings on the subject are to be held on 11 June 1980, by the Honorable Glenn M. Anderson, Chairman, Subcommittee on Aviation, Public Works and Transportation Committee, U.S. House of Representatives. Information received from the FAA indicates that, although written comments on the proposal were requested by 15 April 1980, written comments received prior to the August FAA meetings will be considered. It is also understood that a decision on this matter by the FAA will be rendered on or about 15 August 1980 with any implementation actions tentatively scheduled for 1 January 1981.

5. The continued operation of adequate and responsive air service to the Washington National Airport is considered of critical importance to the efficient and economical accomplishment of the mission of the Navy. It is therefore requested that a DOD position paper in opposition to the proposed change be prepared and submitted to the FAA as soon as practicable in order to be considered by the FAA prior to a final decision in this matter.

J. E. SCOTT

Copy to: (w/o encls)
CDR MEMC (INFO-PTS) (Advance)

Blind copy to: (w/o encls)
Mr. William J. Jonak, President, Norfolk Chamber of Commerce, P.O. Box 327, Norfolk, VA 23501

✓ The Honorable G. William Whitehurst, U.S. House of Representatives
Mr. Kenneth R. Scott, Executive Director, Norfolk Port and Industrial Authority, Norfolk International Airport, Norfolk, VA 23518

STATEMENT OF THE HONORABLE ROBERT A. YOUNG TO THE SUBCOMMITTEE ON AVIATION,
HOUSE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION.

SUBCOMMITTEE HEARINGS ON THE DEPARTMENT OF TRANSPORTATION PROPOSED POLICY
FOR METROPOLITAN WASHINGTON AIRPORTS.

JUNE 11, 12, & 19, 1980

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE, IT IS A PLEASURE FOR ME TO
SPEAK BEFORE YOU TODAY ON A PROPOSAL OF GREAT IMPORTANCE TO THE CITY OF
ST. LOUIS.

THE PURPOSE OF MY STATEMENT TODAY IS TO EXPRESS MY CONCERN REGARDING THE
DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION'S POLICY
PROPOSAL WHICH WOULD FURTHER RESTRICT THE AVAILABILITY OF AIR SERVICE AT
WASHINGTON NATIONAL AIRPORT. THE STATED PURPOSE OF THE F.A.A. ACTION IS TO
REDUCE THE NOISE LEVELS IN THE APPROACH AND DEPARTURE CORRIDORS TO NATIONAL
AND TO PLACE AN ANNUAL CEILING IN THE NUMBER OF PASSENGERS SERVED AT
NATIONAL IN ORDER TO STIMULATE GROWTH AT DULLES INTERNATIONAL AND BALTIMORE -
WASHINGTON INTERNATIONAL AIRPORTS. AS WELL MEANING AS THESE ACTIONS MAY BE,
THE IMPOSITION OF THE F.A.A.'S PROPOSED ACTION WILL HAVE A NEGATIVE IMPACT
ON PUBLIC SERVICE.

THE CITY OF ST. LOUIS RELIES HEAVILY ON ITS SERVICE TO NATIONAL. TO REDUCE
THE NUMBER OF SLOTS AVAILABLE TO AIR CARRIERS WOULD SURELY FORCE ST. LOUIS
TRAVELERS TO USE LESS CONVENIENT (AND MORE CONGESTED) FACILITIES. ADDITIONALLY,
SINCE ST. LOUIS IS THE FARTHEST POINT WEST WHICH CURRENTLY HAS NON-STOP
SERVICE TO NATIONAL, A REDUCTION IN THE NUMBER OF ST. LOUIS SERVICES WILL

FORCE PASSENGERS TRAVELING TO OR FROM CITIES FARTHER WEST TO USE LESS CONVENIENT GATEWAYS. THOSE PASSENGERS THAT WOULD STILL BE ABLE TO TRAVEL VIA ST. LOUIS WOULD OCCUPY A GREATER PERCENTAGE OF ST. LOUIS' SEATS, THUS MAKING IT MORE DIFFICULT IF NOT IMPOSSIBLE FOR THE CARRIERS TO ACCOMMODATE ST. LOUIS' NEEDS IN THE MARKET.

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IT IS CLEAR THAT THE F.A.A.'S PROPOSED ACTION WOULD REDUCE AIRLINE OPERATIONS. HOWEVER, THERE ARE TWO RATHER DISTURBING ASPECTS OF THE PLAN: ONE WOULD ESTABLISH STRICT CURFENS FOR ALL AIRCRAFT AND THE OTHER WOULD ESTABLISH AN ANNUAL PASSENGER LIMIT OF 18 MILLION.

IT HAS COME TO MY ATTENTION THAT THE AIR TRANSPORT ASSOCIATION HAS PROPOSED AN ALTERNATE PLAN FOR WASHINGTON NATIONAL WHICH CONTAINS A VARIABLE HOURLY SLOT ALLOCATION. IT WOULD ALLOW MORE AIR CARRIER OPERATIONS PER HOUR WHEN THE SURROUNDING NOISE LEVEL IS HIGH DURING CERTAIN DAYTIME HOURS AND MAKE SIGNIFICANT REDUCTIONS WHEN IT IS LOW DURING EARLY MORNING AND LATE EVENING HOURS, AND PARTICULARLY DURING SENSITIVE WEEKEND HOURS. I BELIEVE THE A.T.A.'S PROPOSAL IS A MORE RATIONAL RESPONSE TO THE PROBLEMS AT WASHINGTON NATIONAL BECAUSE IT ADDRESSES THE ENVIRONMENTAL CONCERNS OF THE AIRPORT'S NEIGHBORS AND MEETS THE PUBLIC TRANSPORTATION DEMANDS.

ALTHOUGH THE CITY OF ST. LOUIS WOULD PREFER THAT NO CHANGE BE MANDATED BY THE FEDERAL AVIATION ADMINISTRATION WITH REGARDS TO THE LEVEL OF OPERATIONS WHICH CURRENTLY EXIST AT NATIONAL, IF A SLOT REDUCTION MUST BE MADE, I WOULD PREFER THAT THE AIR TRANSPORT ASSOCIATION'S (ATA) PROPOSAL BE ADOPTED. THE TWO SUGGESTIONS OFFERED BY THE F.A.A. WOULD ADVERSELY IMPACT NATIONAL'S

ABILITY TO SERVE THE TRAVELING PUBLIC.

IN SUMMARY, ON BEHALF OF THE CITY OF ST. LOUIS, I RESPECTFULLY REQUEST THAT EVERY POSSIBLE CONSIDERATION BE GIVEN TO THE A.T.A.'S PROPOSAL. THE AVAILABILITY OF A HIGH LEVEL OF SERVICE IN THE ST. LOUIS - WASHINGTON (NATIONAL) MARKET IS VITAL TO THE CONTINUED ECONOMIC GROWTH OF NOT ONLY ST. LOUIS, BUT A GREAT MANY OTHER CITIES IN MISSOURI AND STATES FARTHER WEST. I SINCERELY HOPE THAT THIS COMMITTEE RECOMMENDS THAT THE FEDERAL AVIATION ADMINISTRATION ADOPT THE A.T.A.'S SLOT ALLOCATION PROPOSAL WHICH WILL LIMIT THE NEGATIVE IMPACT THAT A SLOT REDUCTION WILL CREATE.

ADDITIONS TO THE RECORD

GENERAL

CHAMBER OF COMMERCE OF THE BOROUGH OF QUEENS

CITY OF NEW YORK

880 JUN -9 AM 10:12

34-16 QUEENS PLAZA SOUTH
LONG ISLAND CITY, N.Y. 11101

Telephone: (212) 784-7700

HED R. ARNOLD

President

RAYMOND J. KRASINSKI

Treasurer

JAMES J. THORNTON

Executive Vice-President

GLENN M. ANDERSON
Member of Congress
Washington Office

June 5, 1980

Hon. Glenn M. Anderson
Chairman, Subcommittee on Aviation
Public Works & Transportation Committees
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

The Queens Chamber of Commerce, representing more than 1400 business & industrial firms in the Borough of Queens, questions the advisability of the Federal Aviation Administration's proposed reduction in air service at Washington National Airport.

We understand that principal points in the FAA proposal include: a cut-back in hourly aircraft movements from 40 to 30 for a daily decrease of 118, and an earlier airport closing from 10 P.M. to 9:30 P.M.

Without question, the proposed FAA changes could affect an estimated 5,000 passengers daily throughout the United States ...including those using Kennedy International and LaGuardia Airports in Queens.

In the 1930's, the Queens Chamber was largely responsible for selecting the actual sites for what are today's Kennedy and LaGuardia...where today 51,000 employees earn 1 billion 100 million in salaries annually. This is our largest single industry and a major factor in Queens County's healthy economy.

Over the span of years, the Chamber has fought consistently to maintain these two airports and encourage their growth and service to the air-minded public. During this period, we encountered strong and sometimes belligerent opposition to airport growth and development, principally because of the noise factor involved.

Today, I am proud to report, Kennedy and LaGuardia are "good neighbors" to two million people in Queens. And what remains of aircraft noise, as you well know, is on its way toward alleviation.

What the FAA is proposing for Washington National Airport would, in our view, prove detrimental to the future operation of that airport. Restraint on utilization of airports, at a time when airlines are struggling to boost passenger bookings and stay out of the red, does not seem sensible. Alleviation of the noise problem is. And the Queens Chamber subscribes to this.

But we do not subscribe to the proposed further limitation on aircraft flights at Washington National during evening hours. Apart from insistence upon efficiency of operation...which we agree with...the real issue here is "noise". So why not get on with a real solution to this problem?

From a Queens standpoint, the Chamber is wary of the possible spill-over effect of the proposed Washington National limitations on Kennedy and LaGuardia.

Therefore, we respectfully urge your rejection of the FAA proposals and possible recommendation of a more reasonable solution to the alleged problem.

Sincerely,



NRA:br

NED E. ARNOLD
President



ALEXANDRIA
Chamber of Commerce

June 9, 1980

Committee on Public Works
& Transportation
Rayburn House Office Building
Room 2165
Washington, D.C. 20515

Attn: Mr. Joseph Italiano
Subcommittee on Aviation
Hearing of June 11, 1980

The officers and directors of the Alexandria Chamber of Commerce would like to be on record in support of the continued operation of National Airport as a major gateway to the Metropolitan Washington Area.

National Airport is a convenience for hundreds of thousands of people for quick energy efficient access to our nation's capital. Its link to Metro Rail and close proximity to major office and hotel facilities make it an extremely efficient and convenient transportation facility.

Much of the economic expansion that is building Alexandria's tax base is directly attributable to the close proximity to National Airport.

We most sincerely request your utmost attention to keeping this valuable transportation link viable and convenient for the thousands who utilize it for the people and businesses whose jobs and profitability depend on it.

Sincerely,

Robert E. Bellavance
Executive Vice President
& General Manager

ew



WAYNARD JACKSON
Mayor
GEORGE J. BERRY
Commissioner of Aviation
CALVIN D. CARTER
Deputy Commissioner of Aviation
RICHARD A. STODOL
Assistant Commissioner of Aviation

WILLIAM B. HARTSFIELD
**ATLANTA INTERNATIONAL
AIRPORT**

DEPARTMENT OF AVIATION
ATLANTA, GEORGIA 30308
404-786-2772

June 2, 1980

Honorable Glenn M. Anderson
Chairman, Subcommittee on Aviation
Public Works & Transportation Committee
U. S. House of Representatives
Washington, D. C. 20515

Dear Chairman Anderson:

This concerns the Aviation Subcommittee oversight hearings on the Federal Aviation Administration's on Washington National Airport's Operating Policy scheduled for June 11, 1980.

We are much concerned about any policy that would restrict the users of this airport...the second busiest in the world, from access into Washington National. Atlanta travelers want and use the convenience of National especially now that the rapid transit line is operational at that facility.

We are aware that the proposed policy alternatives do not in themselves appear to restrict National from Atlanta users but many in the industry and among the traveling public appear to be concerned that the effect of the proposed rules would be to restrict growth and possibly usage between the major hubs like Atlanta and the National facility. We hope very much that the committee will take this matter into consideration before recommending any policy for Washington National Airport.

Very truly yours,

George J. Berry
George J. Berry

GB:ml

cc: Hon. Elliott Levitas
Hon. Newt Gingrich
Hon. Wyche Fowler



PENINSULA CHAMBER OF COMMERCE
SERVING HAMPTON • NEWPORT NEWS • POQUOSON AND YORK COUNTY

June 6, 1980

The Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation, Public Works
and Transportation Committee
U. S. House of Representatives
Suite 2410, Rayburn House Office Building
Washington, D. C. 20515

Dear Mr. Anderson:

Reference is made to the enclosed copy of a letter from the
Area Cooperation Committee dated June 3, 1980.

Please be advised that this Chamber of Commerce has been
greatly concerned with air service between Patrick Henry (Newport
News) and Washington National Airports.

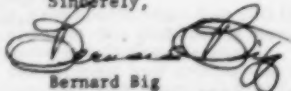
We have been pleased by the completion of one year of commuter
air service between these two destinations. This particular
commuter was obtained after other carriers discontinued their
scheduled flights following the de-regulation process.

Should restrictions at Washington National Airport limit
our current air services, we will be improperly and severely
handicapped. There are several military installations, NASA Langley
Research Center and many vital Defense-oriented industrial activities
in our Lower Virginia Peninsula. All of these generate a high
priority requirement for rapid air service to Metropolitan
Washington and especially to Northern Virginia and to the Pentagon.

We sincerely hope that your Subcommittee will consider the
implications on our National Defense capabilities in any study
that may lengthen or disrupt our present air service arrangements.

Thank you.

Sincerely,


Bernard Big
Executive Vice President

BB/ral

Enclosure

Area Cooperation Committee

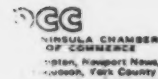
Serving the community interests of 1,200,000 people

June 3, 1980



Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation, Public Works
and Transportation Committee
U. S. House of Representatives
2410 Rayburn Building
Washington, D. C. 20515

RE: "Washington National Airport
Operating Policy" Oversight
Hearings



Dear Mr. Anderson:

The Area Cooperation Committee is comprised of Chambers of Commerce in both the Newport News and Norfolk SMSA's, and represents in excess of 6,000 business members in the affiliated cities.



While most of the Chambers have responded individually to the FAA regarding proposed changes in the above named policy, we wish to go on record as an areawide body in opposition to the air perimeter mileage limitations being considered.



Over 1.3 million people are serviced in Southeast Virginia and Northeast North Carolina by Norfolk International Airport and Patrick Henry Airport. Last year, some 157,000 local passengers were served via the Newport News-Norfolk and Washington National Airport market. An additional 213,000 on-line and connecting passengers were served through Washington National.



Therefore, in the public interest of the 1.3 million people in our market area, and for the expressed need of our citizenry, business community and massive military community to have adequate access to the Nation's Capital, we urge that no action be taken to diminish reliable service to this crucial short-haul market.

Respectfully submitted,

Andrew B. Damiani, Chairman
Areawide Highways/Transportation
Committee

ABD/mds



Civic Association of HOLLIN HILLS, Inc.
1600 PAUL SPRING ROAD
ALEXANDRIA, VIRGINIA 22307

Subcommittee on Aviation
Committee on Public Works and Transportation
U.S. House of Representatives
2165 Rayburn House Office Building
Washington D.C. 20515

June 2, 1980

Dear Sirs,

I have been advised by your staff that I will not be invited to testify before the Subcommittee on June 11, 1980 when you will be holding a hearing on the Department of Transportation's Proposed Policy for Metropolitan Washington Airports. I am concerned that a community of over 1,000 persons which is so directly affected by the Proposed Policy should not be included - cities which are 1,000 miles away are being invited; Hollin Hills which is five miles away from National Airport is not.

In view of the fact that I can not present my community's opinion as a witness, I am forwarding the following written statement. We recommend that the following goals for National Airport be established by the FAA to reduce serious noise and air pollution as well as to reduce crash and collision hazards:

1. Stop the growth of National Airport both in numbers of planes and passengers, and in facilities to service them and start moving some of its operations to Dulles Airport.
2. Reduce air carrier slots gradually to achieve a 50 percent reduction in jet traffic by 1985.
3. Retain the 650 mile limit for non-stop flights and eliminate privileges of the seven cities beyond that limit.
4. Allow wide-bodied planes only if they can operate safely as such a small airport and only if two smaller jets are removed for every big one.
5. Limit passenger levels to 14,000,000 per year instead of the proposed 18,000,000.
6. Establish a Citizens Advisory Board to advise the FAA on airport policy as it affects the entire area.
7. Establish mandatory curfew hours of 9:30 pm to 7 am on week days and 9:30 to 8 am on weekends.
8. Provide fast accessible transportation for Dulles with arrangements for handling baggage and the publicity necessary to inform the public of the improved services.
9. Study noise abatement techniques now available while assessing more carefully the physical and emotional effects of aircraft noise and pollution.
10. Work with the Council of Governments and other local bodies to disperse the flight departure patterns from National so that noise exposure is more fairly distributed.

Further I call your attention to the fact that the Mount

Vernon Council of Citizens Associations which represents about 50,000 people in an area just south of Alexandria and bordering the Potomac river, supports these same recommendations and is forwarding its Resolution to the Federal Aviation Administration at this time.

I hope the Subcommittee will give full weight in its deliberations to the needs of the citizens of my area and of the metropolitan area - they have been ignored for too long.

Sincerely yours,

DA Bovet

David Bovet, President

cc. Congressman Herbert E. Harris II
Supervisor Sandra L. Duckworth
Eric Bernthal, Coalition on Airport Problems

Greater Madison Chamber of Commerce

815 EAST WASHINGTON AVENUE, SUITE 71 • 608 258-0348
MADISON, WISCONSIN 53701

RECEIVED
GLENN M. ANDERSON
MEMBER OF CONGRESS
WASHINGTON OFFICE

May 27, 1980

The Honorable Glenn M. Anderson
Chairman, Subcommittee on Aviation
Public Works & Transportation Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Anderson:

It has been brought to my attention that on June 11, 1980, the House of Representatives Subcommittee on Aviation will hold oversight hearings on the Federal Aviation Administration's proposed Washington National Airport Operating Policy.

I am enclosing a copy of a letter I wrote to the FAA on April 15, as well as a response to that letter from our Congressman Robert Kastenmeier. I would appreciate your seeing that the Madison area's opposition to any reduction of travel to Washington National be incorporated into the record of the hearings.

Thank you for your consideration in this matter.

Sincerely,

Robert W. Brennan
Robert W. Brennan
President

RWB:cj
Enclosures

Greater Madison Chamber of Commerce

211 EAST WASHINGTON AVENUE • P.O. BOX 71 • LEB 274 8140
MADISON WISCONSIN 53701

April 15, 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, S.W.
Washington, D.C. 20591

Gentlemen:

It has been brought to our attention that the Federal Aviation Administration is proposing a rule that would substantially reduce the number of "slots" for scheduled carriers at National Airport.

As a community that deals quite extensively with our nation's capitol, we would oppose any reduction of travel to Washington National. The time convenience for using Washington National as opposed to other facilities in Washington, D.C. is significant.

It is our understanding that moving the "curfew" back to 9:30 p.m. means that late afternoon schedules into National must be backed up or eliminated.

Since those late afternoon flights are most efficient for our community to meet early morning D.C. meetings, we would highly oppose limitations of these late afternoon flights. We are very concerned that service reduction or possible service elimination between some cities and Washington National would most assuredly result.

Thank you for your consideration in this matter.

Sincerely,


Robert W. Brennan
President

RWB:rd

cc: Robert W. Kastenmeier
2nd Congressional District

bec: George Reinke	Senator Fred A. Risser
Joel Skornicka	Tom Pattison
Irving Shain	Collins Ferris
Robert O'Neill	Robert Chernish
Robert Skuldt	Kenneth Sersland
	Ralph Tomlin

BOB KASTENMEIER
 800 NORTH GAVIN BUILDING
 118 Madison Avenue
 Madison, Wisconsin 53701
 Phone Area Code 608, 254-2222

Congress of the United States
House of Representatives
 Washington, D.C. 20515

COMMITTEE ON
 JUDICIARY
 CHAIRMAN, SUBCOMMITTEE ON
 COURTS, CIVIL LIBERTIES AND
 THE ADMINISTRATION OF JUSTICE
 SUBCOMMITTEE ON CRIME
 COMMITTEE ON
 INTERIOR AND INSULAR AFFAIRS
 SUBCOMMITTEE ON
 NATIONAL PARKS AND
 INSULAR AFFAIRS

May 7, 1980

Mr. Robert W. Brennan
 President
 Greater Madison Chamber of Commerce
 615 E. Washington Avenue
 Madison, Wisconsin 53701

Dear Mr. Brennan:

Thank you for sending me a copy of your letter to the Federal Aviation Administration concerning proposed regulations reducing the number of slots for scheduled carriers at National Airport.

As you may know, the Federal Aviation Administration is under court order to produce a policy by August which will control noise and congestion around National Airport. The court order resulted from a suit brought by area residents in Virginia.

I certainly share your concern over the effects of such a service reduction on travel between Madison and Washington, and I have written to the FAA in support of your April 15 letter. A copy of my letter is enclosed.

I appreciate your contacting me on this matter, and I welcome any additional comments or questions you may have.

With kind regards,

Sincerely,

ROBERT W. KASTENMEIER
 Member of Congress

Enclosure

RWK:gbb

May 7, 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, S.W.
Washington, D. C. 20591

Gentlemen:

I would like to draw your attention to a letter sent to you by the Greater Madison Chamber of Commerce on April 15 concerning the reduction in scheduled carrier service at National Airport.

I share the Chamber's concern over the possible effects of the 9:30 p.m. curfew on late afternoon flights from Madison. A reduction of such service to National Airport would result in a major inconvenience for the many travellers between Wisconsin and Washington. This is especially true due to the fact that the late afternoon flights tend to be the most efficient for those who must make short business trips to the nation's capitol.

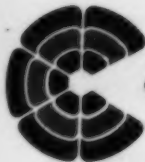
I hope that the FAA will give every consideration to preserving current levels of late afternoon service at National Airport in formulating the new regulations.

With kind regards,

Sincerely,

ROBERT W. KASTERMEIER
Member of Congress

RWK:gbb



COLUMBUS
CHAMBER OF
COMMERCE

P.O. BOX 1300/COLUMBUS, GEORGIA 31903/(404) 327-1888

2

May 28, 1980

The Honorable Glenn W. Anderson
Chairman
Subcommittee on Aviation
Public Works and Transportation Committee
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Anderson:

Please incorporate the attached statement into the official record of your oversight hearings, scheduled for June 11, concerning FAA's proposed reduction in operations at Washington National Airport.

Cordially,

Dennis W. Calhoun
Dennis W. Calhoun
President

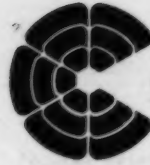
hf

Attached



IT'S HERE IN COLUMBUS, GEORGIA





**COLUMBUS
CHAMBER OF
COMMERCE**

P.O. BOX 1200/COLUMBUS, GEORGIA 31902/(404) 527-1588

STATEMENT FOR THE RECORD
U. S. HOUSE OF REPRESENTATIVES AVIATION SUBCOMMITTEE
OVERSIGHT HEARINGS ON FAA'S PROPOSED
WASHINGTON NATIONAL AIRPORT OPERATING POLICY

We have just learned of a new proposed policy by FAA to further limit scheduled air carrier operations at Washington National Airport.

In this area, it has been normal for those arranging flights to our Nation's Capitol to seek a scheduled flight that arrives at Washington National. This was a first priority item in view of the close-in convenience of this facility. Indeed a few years ago, when this community had scheduled non-stop service to Dulles International, it was not unusual for many travellers to forego the non-stop flight and subject themselves to a transfer in Atlanta in order to gain the advantage of arriving at Washington National.

It has been noted also that part of the rationale behind the proposal has to do with Washington population surveys and suburban development and convenience. It seems unrealistic and unbelievable that the convenience of the local community could have this degree of impact on the many outside passengers to and from the Washington area.

One of the key advantages to the use of Washington National Airport from this area, has been the ability to arrange a one day business trip without an overnight stay. This will be further curtailed by the proposed prohibition of scheduled flights after 9:30 P.M. In fact, it is not understood why this

IT'S HERE IN COLUMBUS, GEORGIA



prohibition was previously made for 10:00 P.M. in the first place. In short, these restrictions place an undue hardship on Georgians who wish to visit our Nation's Capitol and to do business.

Washington, D. C. is one of the most popular out of state destinations when travelling from this area. Use of Washington National Airport is the prime feature of the excellent airline service from Georgia to Washington. We strongly oppose the latest proposed curtailment of service and future usage of National Airport. We urge your consideration of our views.

John A. Chapman,
President

Charleston Regional Chamber of Commerce and Development

AND
CD

June 6, 1980

Honorable Glen A. Anderson
Chairman, Public Works and
Transportation Committee
Subcommittee on Aviation
House of Representatives
Washington, D. C. 20515

Dear Congressman Anderson:

This community is very disturbed over the possibility that the rule changes, proposed by the Federal Aviation Administration restricting access to the Washington National Airport, might be approved.

We have expressed our strong opposition to these proposed rules directly to the FAA.

I have attached a sample of letters sent to the FAA expressing our views for consideration by you and your Subcommittee on Aviation.

Under the present rules, West Virginians can spend a day in the nation's capital and return home the same night by air. If we are forced to use Dulles or Baltimore Airports, ground time to Washington will be as great as flight time and will result in less face to face contact or a significant increase in the cost and time required for such contact.

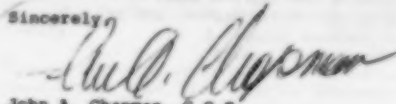
The net result of the adoptions of these rules will be the forced use of Dulles and Baltimore Airports. There is no way a short-haul flight can outbid a long-haul wide bodied flight for landing rights. It is not possible for long-haul passengers to spend a day at the capital and return home the same night landing at either Washington National or the outlying airports. Time saved for such long-haul passengers would be proportionately nominal but for us would be serious.

Letter to Mr. Anderson
June 6, 1980
Page Two

Washington, D. C. and New York City are the destinations for more air travelers from Charleston than any other city in the country. Denial of Washington National service would be costly and have a negative impact on our economy.

On behalf of the 90,000 annual passengers from Charleston to Washington National Airport, I urge you to oppose the autocratic imposition of the FAA proposed rules.

Sincerely,



John A. Chapman, C.C.E.
President

JAC:et

Enclosures

COLUMBIA GAS TRANSMISSION CORPORATION

W. W. FERRILL
Chairman of the Board



ADDRESS REPLY TO
POST OFFICE BOX 1272
CHARLESTON WEST VIRGINIA 25309

May 2, 1980

Federal Aviation Administration
Office of the Chief Counsel
Attention: Rules Docket, AGC-24
Independence Avenue, S. W.
Washington, DC 20591

Gentlemen:

Re: COMMENTS
Submitted by Columbia Gas Transmission Corporation
Airline Service Operating To and From Charleston,
West Virginia and National Airport, Washington, DC
FAA Rulemaking Docket No. 19948

In the above-referenced docket, Notice No. 80-2, "Metropolitan-Washington Airports," the Federal Aviation Administration is proposing changes in operations at Washington's National Airport that would reduce the number of air carrier landings permitted each day by more than 18%. In addition, the FAA proposal would alter or eliminate the requirement that aircraft arriving or departing from Washington National must be operating from or to a point within a distance of 650 miles.

As you are aware, recent curtailment of operations into and out of Charleston by Piedmont Airlines, because of fuel costs and other reasons, already has reduced air service between Charleston and the nation's capital to a bare minimum. Should the two proposals now being considered by the FAA be approved, it would very likely result in the loss of the few direct flights that still are in operation.

Columbia Gas Transmission and many other companies in West Virginia are dependent upon reasonable air transportation to adequately conduct essential business with the federal government.

The elimination or further reduction in the minimal air service currently available between Charleston and Washington would result in increased operating costs to Columbia at a time when every effort needs to be made to hold down rising utility costs. At present, Columbia employees are making an average of 40 round trips per month to Washington to attend hearings and other meetings required by the Federal Energy Regulatory Commission and the numerous other federal agencies that regulate all phases of Columbia's operations.

May 2, 1980

Even under the reduced flight schedule, it is still possible for most of these trips to be accomplished in one day, thereby eliminating the necessity and added expense of remaining overnight.

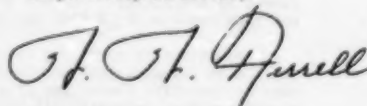
Under the proposed 18% reduction in the number of flights, the total available landing slots at National Airport would be reduced from 640 to about 520 per day. This is serious enough in itself, but combined with the proposal to drop or to extend the 650-mile limit will result in longer-distance flights competing for the reduced number of landing slots at National. This combination of circumstances most certainly will result in Charleston losing most or all of its current daily service to National.

Diversion of Charleston flights to Dulles or to Baltimore-Washington Airports would result in greater ground travel time. For example, National is only 15 minutes from downtown Washington. However, ground travel time to and from downtown Washington to Dulles or to Baltimore-Washington is considerably in excess of an hour. This, in itself, virtually eliminates the viability and accompanying economies of one-day business trips to Washington.

Moreover, since it is more likely that travelers from distances in excess of 650 miles would ordinarily be planning more than a one-day stay in Washington, it would seem logical to maintain the status of Washington National as a short-haul airport and channel the larger aircraft arriving from greater distances to Baltimore-Washington or to Dulles.

We, in Charleston -- particularly the business traveler -- have suffered enough erosion in our air travel service in the past few years and should be given specific consideration before this further reduction in service is authorized.

Respectfully submitted,



C: The Honorable Robert C. Byrd
The Honorable Jennings Randolph
The Honorable Robert H. Mollohan
The Honorable Harley G. Staggers
The Honorable Nick Rahall



STATE OF WEST VIRGINIA

GOVERNOR'S OFFICE
OF
ECONOMIC AND COMMUNITY DEVELOPMENT
CHARLESTON 25306

JOHN D. ROCKEFELLER IV
GOVERNOR

C. JOE MULLEN
DIRECTOR

Mr. Clark H. Onstad
Office of Chief Council--AGC-204
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Onstad:

RE: FAA Notice - 2

This is in response to your request for comments on the Metropolitan Washington Airport Policy - Draft Environmental Impact Statement.

West Virginia's air service could be severely impacted by reductions in operating hours at Washington National Airport if these reductions result in a cutback in the number of slots available to air carriers operating directly from West Virginia communities or indirectly through other West Virginia hubs. The need for timely and efficient air service to the Nation's Capitol cannot be overstated. Certain government and commercial transactions could not take place without this service.

Reductions in operating hours at Washington National could affect air service in two ways that are important to the West Virginia traveller: 1) a loss of important slots; and 2) a diversion of traffic to Dulles or Baltimore-Washington International Airports.

The aviation environment created by the Airline Deregulation Act has not been favorable to the West Virginia air traveller. Major carriers have discontinued service to West Virginia points in favor of longer routes with higher load factors. West Virginia's proximity to Washington National does not place it in a favorable comparative position to other, more distant states which are able to benefit from long-haul routes. Airlines, if given the choice, will operate the more profitable, long route. Therefore, if FAA reduces the number of slots available to each carrier and allows the carrier the option of selecting which slots it will utilize solely on the basis of profitability, then service between West Virginia and Washington National could be severely constrained and, at the least, unnecessarily circuitous.

The number of flights between West Virginia points and Washington National is not great; therefore, any reduction in the number of flights could be viewed as a serious service loss. If the operations reductions at Washington National eventuate, FAA, in conjunction with the Civil Aeronautics Board, should not permit a carrier to drop a slot that would eliminate travel from a West Virginia point or make travel to and from Washington unduly circuitous or time consuming.

The Dulles and Baltimore-Washington International Airports would certainly experience increases in traffic from any operations reductions at Washington National. Due to ground transportation difficulties, carrier service from either of these airports to West Virginia points has the disadvantage of doubling the trip time between West Virginia and the City of Washington. The cost of a trip to Washington would rise due to the increased ground transportation costs.

The only benefit that could be derived from a service shift to either airport would be an increase in the number of flights. For reasons stated above, frequency of carrier service to West Virginia points cannot be expected to increase--the trip distance is too short.

An increase in the number of hourly commuter slots available at Washington National is very important to the continued development of West Virginia's aviation network. The Governor's Office of Economic and Community Development is in support of FAA's effort to expand the number of available commuter slots.

I appreciate the opportunity to comment on this issue and you can be assured of my continued interest in future developments.

Sincerely,

C. Joe Mullen

CJM:kgb

cc: Senator Robert Byrd
Senator Jennings Randolph
Governor John D. Rockefeller, IV

John A. Chapman,
President



Charleston Regional Chamber of Commerce and Development

February 26, 1980

Mr. James A. Wilding
Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport
Hanger 9
Washington, D. C. 20001

Dear Mr. Wilding:

I reviewed the proposed policy governing the Metropolitan Washington Airports and wish to comment on the proposed changes.

Washington is the number one destination for persons flying from Charleston. Any restrictions in air connections between Charleston and Washington, D. C., will materially affect this community detrimentally.

I support removal of the constraint regarding the use of wide-body aircraft at National Airport so that even if it is judged essential to reduce the number of flights, the number of passengers at National can be maintained.

It is inconceivable to me that there should be any further restrictions on the ability of citizens to travel to and from the nation's capital by air. The use of Dulles for persons having business in Washington, D. C., is impractical. The additional time and sizeable cost of commuting from Dulles to Washington makes it a very unattractive alternative for persons having a destination in Washington.

Certainly efforts should be made to transfer from National to Dulles those air passengers who are simply using Washington as a transfer point. This could reduce congestion at National without denying the use of National to those having business in Washington.

Page Two
Letter: Mr. James A. Wilding
February 26, 1980

It is not fair to the airlines or air passengers to shorten the hours at National. Persons who have moved close to the airport and are affected by the noise, have done so knowledgeably. The airlines should not be penalized for those voluntary decisions of residents near the airport who expose themselves to such noise. There should not be a change on the perimeter of non-stop service at National, its capacity is already being strained at National.

In summary, it is already difficult enough for the citizen and taxpayer to be heard in the nation's capital. I certainly hope that no steps are going to be taken that will make it even more difficult for him to be seen as well.

Sincerely,


John A. Chapman, C.C.E.
President

JAC:bl
cc: John Bowyer
Charleston Newspapers

Robert Baronner
Vice President
Industrial Development

bcc: William Grubb
Piedmont Airlines

JEFFERDS CORPORATION

Engineers
Materials Handling

April 21, 1980

*Washington National
Air Service*

U.S. Rt 35, West
P.O. Box 757
St Albans, WV 25177
Phone 304/755-8111

FEDERAL AVIATION ADMINISTRATION

Office of the Chief Counsel
ATTN: RULLE DOCKET, AGC-44
Independence Avenue SW
Washington, D.C. 20591

Re: Docket

We have received advice of proposals to alter the policy governing the operation of Washington, D.C.'s National Airport. Please be advised that the close proximity of Washington National to downtown Washington makes possible many one way business trips to the city. Neither Dulles nor Baltimore is sufficiently accessible for such a purpose.

We are very much in favor of using Dulles on holidays in the case of long hauls but believe that National should be primarily used for flights originating 600 miles or less from Washington.

Thank you for your consideration.

Very truly yours,

J. C. Jeffords, Jr.

cc: Me

cc: Mr. John Chapman ✓

MEMBERS RANKED BY SENIORITY
 JIM AND S. SCHWARTZ, MAINE ROBERT V. STAFFORD, VT.
 MIKE CRAVER, ALABAMA MICHAEL H. DAVIS, JR., TEXAS
 LLOYD BARTON, TENN. PETER V. DOMINICK, N. CAROL
 GUYTON H. BURGESS, N. DAK. JOHN H. CHAFFEE, R.I.
 JOHN E. CHAPIN, OHIO ALAN G. SHAPIRO, WYO.
 GARY HART, CALIF. LARRY PRESSLER, S. DAK.
 DANIEL PATRICK MOYNIHAN, N.Y.
 JOHN W. TROTT, JR., STAFF DIRECTOR
 DALEY GUARD, SENIORITY STAFF DIRECTOR

United States Senate
 COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
 WASHINGTON, D.C. 20510

April 30, 1980

Honorable Langhorne M. Bond
 Administrator
 Federal Aviation Administration
 800 Independence Avenue, S.W.
 Washington, D. C. 20591

Dear Administrator Bond:

This communication is in reference to FAA Docket No. 19948, Notice No. 80-2, proposed rulemaking for Metropolitan Washington Airports. We have had very strong expressions of concern relative to the proposed new rules for the operation of Washington National Airport with regard to West Virginia's air service.

While the plan proposes to increase commuter slots thereby improving service to small cities and communities that have experienced a reduction or loss of service as the larger carriers have concentrated their operations on larger markets, this might inevitably produce a substantial reduction in the service provided by larger carriers to West Virginia communities. It is believed that such a proposal should be carefully analyzed before any decisions are made.

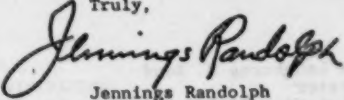
With regard to a reduction in operating hours at Washington National, West Virginia's air service could be severely and adversely affected. A reduction in flights between West Virginia and Washington National Airport would mean a serious loss of service to our communities.

There has also been concern expressed regarding the proposal to authorize the use of wide-bodied "jumbo" jets which are not now permitted at National, and the elimination of the 650 mile perimeter rule. It is believed that any hub airport like Washington National has a primary responsibility to provide service to the close-in cities.

April 30, 1980
Honorable Langhorne M. Bond
Page 2

Your careful assessment of this situation will be appreciated. I urge that no action be taken that would adversely affect service between West Virginia cities and Washington National Airport.

Truly,


Jennings Randolph

Chicago Association of Commerce and Industry

130 SOUTH MICHIGAN AVENUE, CHICAGO, ILLINOIS 60603 - 786-0111

THOMAS H. COULTER
CHIEF EXECUTIVE OFFICER

June 6, 1980

Honorable Glenn M. Anderson
Member of Congress
2410 Rayburn House Office Building
Washington D. C. 20515

Subject: FAA Proposed Washington National
Airport Operating Policy

Dear Mr. Anderson:

The Chicago Association of Commerce and Industry respectfully submits the following statement for inclusion in the record on the oversight hearings on FAA's proposed Washington National Airport operating policy. Similar statements were filed June 22, 1978 with the Director of the Metropolitan Washington Airports and April 11, 1980 with the Office of the Chief Counsel of the Federal Aviation Administration.

The Chicago Association of Commerce and Industry, a voluntary organization of individuals, firms and corporations, functions as the Chamber of Commerce for the Chicago Metropolitan Area. Among the principal objectives of this Association, currently consisting of over 6,000 members, is to foster and promote adequate and efficient air transportation services for the Chicago region.

The Association opposes the FAA's proposed policy to further restrict operations at Washington National Airport. These restrictions would impose severe handicaps on many Chicago area residents who utilize the close-in service to the center of our government's operations provided through that airport. Currently, there are about 1,600 flights scheduled monthly between Chicago and Washington National.

June 6, 1980
Page 2

Honorable Glenn M. Anderson

Establishment of different restrictions at individual airports across the country has a very disruptive effect on our nation's air transportation system. As the nation's air hub, Chicago air services would be adversely affected by any restrictions imposed at airports throughout the nation. The Association therefore urges that the proposed restrictions at Washington National Airport not be allowed to take effect.

Respectfully submitted,

Thomas H. Coulter
Thomas H. Coulter

CC-Rep. Gene Snyder
Illinois Congressional
Delegation

CENTRAL WEST VIRGINIA REGIONAL AIRPORT AUTHORITY

PHONE 244-8033
AC 304RALPH R. COWGILL
DIRECTOR OF AVIATION

April 10, 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, SW
Washington, D.C. 20591

Attention: Rules Docket AGC-24

Re: Docket numbers 19948, 19950, FAA Notice No. 80-2, DOT 128-79,
Air Transport Association response to proposed Washington
National Airport Operating Restrictions

Gentlemen:

There is an old adage which reads, "If it ain't broke, don't fix it". It appears to us that the DOT-FAA proposal will have the possible impact of reducing future air service into and out of cities the size of Charleston, West Virginia; therefore, we are opposed to any proposal which would substantially reduce the number of "slots" for scheduled air carriers at Washington National Airport.

It is our understanding that DOT proposes to reduce 118 slots from the 650 daily slots which the air carriers are now permitted, a reduction of 18%. Approximately 5,000 or more daily passengers would be either shunted off to another airport or simply not accommodated. Service reductions or service eliminations between Washington National and some cities would most assuredly result.

Further, we believe that the quality of airline service throughout rural America has decayed rapidly since the passage of the Airline Deregulation Act in 1978. We urge the DOT and the FAA not to impose a curfew prohibiting airlines from scheduling operations after 9:30 p.m. and to maintain the present perimeter rule of 650 miles. Dulles Airport should be used to serve the wide body aircraft and markets over 650 miles.

If the proposed Washington National Airport restrictions become policy, will the operating budget be cut proportionately?

Very truly yours, -

Ralph R. Cowgill
Director of Aviation

CENTRAL WEST VIRGINIA REGIONAL AIRPORT AUTHORITY

Correspondence dated April 10, 1980
Federal Aviation Administration

cc: Senator R. Byrd
Senator J. Randolph
Congressman N. Rahall
Members of the Kanawha Co. Commission
Mayor J. Hutchinson
President, Charleston Chamber of Commerce and Development
Mr. W. Richards, Exec. Director, WV Aeronautics Commission
Mr. E. Colodny, Chairman, USAir, Inc.
Mr. W. Howard, Piedmont Airlines
Mr. J. Mullen, State of WV Commerce and Development
Mr. J. Hurd, West Virginia Chamber of Commerce
bcc: Ms. J. Maurice, Charleston Daily Mail
Mr. E. Minnoci, Charleston Gazette
WV State Airport Managers



Charleston Regional Chamber of Commerce and Development
April 9, 1980

TO: AIRLINE SERVICE COMMITTEE
FROM: JOHN A. CHAPMAN
RE: PROPOSED CHANGES AT WASHINGTON NATIONAL AIRPORT

The Federal Aviation Administration has issued a Notice of Proposed Rulemaking (Docket No. 19948, Notice No. 80-2 "Metropolitan-Washington Airports", dated January 21, 1980) which proposes to alter the policy governing the operation of Washington D. C.'s National Airport (DCA). Under the new policy, the number of air-carrier landings allowed per day would be reduced by more than 18 percent. Further, the requirement that arriving/departing aircraft must be operating to points no further than 650 miles distance would either be dropped or extended to 1,000 miles. The combined effect of these two features would likely be a significant loss of direct flights from your city to Washington National. Instead, your Washington service would be increasingly accommodated at Dulles International and Baltimore-Washington International Airports.

The Washington D. C. area is served by three airports. Washington National is located immediately across the Potomac River from downtown Washington D. C., a mere 10 minutes driving time. The other two airports--Dulles International and Baltimore-Washington International--are some 45 minutes to one hour driving time from downtown Washington. For many business travelers to Washington, National Airport's convenient location makes possible efficient one-day business trips. This is particularly true for those cities less than 650 miles distance from Washington D. C.

The current demand for landings at Washington National far exceeds the airports capacity. The current constraints on capacity are two in number. First, because of concern over community noise, the airport is only open to air carrier aircraft from 7 a.m. to 10 p.m. daily. Second, current airport facilities can only accommodate a limited number of aircraft per hour. Existing policies have precluded any expansion of facilities.

Under the prevailing saturated conditions, certain allocations and limitations have existed. First, during normal operating hours, air carriers have been permitted 40 landing slots per hour, commuter airlines 8 per hour, and general aviation aircraft a very limited number. Further, long distance flights--those nonstop flights operating to or from points more than 650 miles distant from Washington--have been barred from using National. This has assured that Washington National is utilized as a short-haul airport.

Under the proposed new arrangement, daily air carrier slots would be reduced from 640 to about 520 landing slots daily. As a result of dropping or extending the 650-mile nonstop limitation, flights originating from a much wider area would be vying for a reduced number of slots. You would undoubtedly lose out on some, if not all, of your flights daily to Washington National. Not only will flights to Dulles or Baltimore-Washington result in greater ground travel time, but in greater scheduled air time because of the more extensive taxiing involved at these larger airports. It is estimated that the total trip time between your city and Washington's central business district would be increased by about 1 hour and 20 minutes one way. Needless to say, the impact of this on the one-day business trip is significant.

818 Virginia Street, East Charleston, West Virginia 25301 (304) 348-0770

Page Two
MEMO
AIRLINE SERVICE COMMITTEE
RE: PROPOSED CHANGES AT WASHINGTON NATIONAL AIRPORT

If you don't like these changes let your Congressional delegation and the FAA hear from you. Send comments to:

Federal Aviation Administration
Office of the Chief Counsel
Attention: Rules Docket, AGC-24
Independence Avenue, S. W.
Washington, D. C. 20591.

JAC:bl
Enclosure

John A. Chapman,
President



Charleston Regional Chamber of Commerce and Development

February 26, 1980



Mr. James A. Wilding
Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport
Hanger 9
Washington, D. C. 20001

Dear Mr. Wilding:

I reviewed the proposed policy governing the Metropolitan Washington Airports and wish to comment on the proposed changes.

Washington is the number one destination for persons flying from Charleston. Any restrictions in air connections between Charleston and Washington, D. C., will materially affect this community detrimentally.

I support removal of the constraint regarding the use of wide-body aircraft at National Airport so that even if it is judged essential to reduce the number of flights, the number of passengers at National can be maintained.

It is inconceivable to me that there should be any further restrictions on the ability of citizens to travel to and from the nation's capital by air. The use of Dulles for persons having business in Washington, D. C., is impractical. The additional time and sizeable cost of commuting from Dulles to Washington makes it a very unattractive alternative for persons having a destination in Washington.

Certainly efforts should be made to transfer from National to Dulles those air passengers who are simply using Washington as a transfer point. This could reduce congestion at National without denying the use of National to those having business in Washington.

Page Two
Letter: Mr. James A. Wilding
February 26, 1980

It is not fair to the airlines or air passengers to shorten the hours at National. Persons who have moved close to the airport and are affected by the noise, have done so knowledgeably. The airlines should not be penalized for those voluntary decisions of residents near the airport who expose themselves to such noise. There should not be a change on the perimeter of non-stop service at National, its capacity is already being strained at National.

In summary, it is already difficult enough for the citizen and taxpayer to be heard in the nation's capital. I certainly hope that no steps are going to be taken that will make it even more difficult for him to be seen as well.

Sincerely,


John A. Chapman, C.C.E.
President

JAC:bl
cc: John Bowyer
Charleston Newspapers

Robert Baronner
Vice President
Industrial Development

bcc: William Grubb
Piedmont Airlines

NICK J. RAHALL, II
4th District, West Virginia

COMMITTEE
PUBLIC WORKS AND
TRANSPORTATION

AVIATION
AIRPORT DEVELOPMENT
AIRPORT TRANSPORTATION

INTERIOR AND URBAN AFFAIRS

CONSTITUTION
BILLS AND RESOLUTIONS
ENERGY AND ENVIRONMENT

Congress of the United States
House of Representatives
Washington, D.C. 20515

400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 555-5400
OFFICE OF THE CLERK
400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 555-5400
CLERK OF THE HOUSE
400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 555-5400
U.S. HOUSE OF REPRESENTATIVES
CLERK OF THE HOUSE
400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 555-5400
U.S. HOUSE OF REPRESENTATIVES
CLERK OF THE HOUSE
400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 555-5400

April 15, 1980

Mr. Ralph R. Cowgill
Director of Aviation
Kanawha Airport
Charleston, West Virginia 25311

Dear Mr. Cowgill:

Thank you for sending me a copy of your letter to the Federal Aviation Administration regarding their proposed regulations to reduce service to Washington National Airport.

Enclosed please find a copy of my letter to the Administrator of the FAA regarding this matter. I strongly oppose this move, and any plans the FAA may have to reduce or close National Airport. National Airport is important to short and medium-haul traffic, and for the service of small-to-medium-sized cities in the eastern half of the country, such as Charleston. I fear that these proposed changes would drastically affect service to West Virginia.

When I have a response to my comments, I will be certain to let you know.

With warm regard, I am

Sincerely,

Nick Rahall
NICK J. RAHALL, II
Member of Congress

NJR/jeb

enclosure



NICK J. RANALL, II
4th District, West Virginia

COMMITTEES
PUBLIC WORKS AND
TRANSPORTATION
SUBCOMMITTEES
AVIATION
SEAPORT DEVELOPMENT
SURFACE TRANSPORTATION

INTERIOR AND INSULAR AFFAIRS
SUBCOMMITTEES
MINES AND MINING
ENERGY AND ENVIRONMENT

Congress of the United States
House of Representatives
Washington, D.C. 20515

400 CONGRESS BUILDING
WASHINGTON, D.C. 20515
(202) 225-3400
OFFICE OF THE CLERK
515 FIFTH AVENUE
WASHINGTON, WEST VIRGINIA 25701
(304) 323-0100
RAN BUILDING
SOMERSET, WEST VIRGINIA 25501
(304) 255-0000
1000 FEDERAL BUILDING
CHARLESTON, WEST VIRGINIA 25301
(304) 255-6233
P. O. BOX 1000
LORAIN, WEST VIRGINIA 25901
(304) 732-0001

April 15, 1980

Mr. Langhorne M. Bond, Administrator
Federal Aviation Administration
800 Independence Avenue, S. W.
Washington, D. C. 20591

DEAR Mr. Bond:

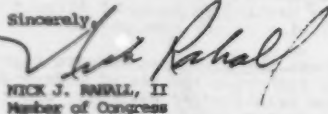
I am writing to express my objections to your proposed regulations which would phase out Washington National Airport by 1990, eventually, and more specifically, would change and limit service into that facility immediately.

Reducing carrier operations, and going to more wide-body jets would seriously threaten service to short and medium-haul traffic points, specifically airports in my home State of West Virginia. Washington National is an important hub airport for many persons, where they can connect to other flights. Loss of available travel to Washington will effectively cut off any type of airline service for many parts of rural America.

I hope, Mr. Bond, that every consideration will be given to the effect this ruling could have on my constituents, and all persons who count on Washington National Airport as a major facility. It is the small to mid-sized city which will suffer.

Thanking you in advance, I am

Sincerely,


NICK J. RANALL, II
Member of Congress

NJR/jeb

JENNIFER BARNES, W. VA., CHAIRMAN
 EDWARD S. MURPHY, MAINE
 RALPH LARSEN, ALASKA
 LLOYD BENTLEY, TENN.
 QUENTIN T. BURROUGHS, N. DAK.
 JOHN C. CALDER, MISS.
 GARY HART, CALIF.
 DANIEL PATRICK MOHRMAN, D.C.
 JOHN W. TARR, JR., STAFF DIRECTOR
 DALEY GORD, SENIORITY STAFF DIRECTOR

United States Senate
 COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
 WASHINGTON, D.C. 20510

April 30, 1980

Honorable Langhorne M. Bond
 Administrator
 Federal Aviation Administration
 800 Independence Avenue, S.W.
 Washington, D. C. 20591

Dear Administrator Bond:

This communication is in reference to FAA Docket No. 19948, Notice No. 80-2, proposed rulemaking for Metropolitan Washington Airports. We have had very strong expressions of concern relative to the proposed new rules for the operation of Washington National Airport with regard to West Virginia's air service.

While the plan proposes to increase commuter slots thereby improving service to small cities and communities that have experienced a reduction or loss of service as the larger carriers have concentrated their operations on larger markets, this might inevitably produce a substantial reduction in the service provided by larger carriers to West Virginia communities. It is believed that such a proposal should be carefully analyzed before any decisions are made.

With regard to a reduction in operating hours at Washington National, West Virginia's air service could be severely and adversely affected. A reduction in flights between West Virginia and Washington National Airport would mean a serious loss of service to our communities.

There has also been concern expressed regarding the proposal to authorize the use of wide-bodied "jumbo" jets which are not now permitted at National, and the elimination of the 650 mile perimeter rule. It is believed that any hub airport like Washington National has a primary responsibility to provide service to the close-in cities.

723

April 30, 1980
Honorable Langhorne M. Bond
Page 2

Your careful assessment of this situation will be appreciated.
I urge that no action be taken that would adversely affect
service between West Virginia cities and Washington National
Airport.

Truly,

Jennings Randolph

Jennings Randolph

bcc: Mr. Ralph R. Cowgill ✓



UNITED STATES SENATE
 COMMITTEE ON APPROPRIATIONS
 WASHINGTON, D.C. 20510

United States Senate

COMMITTEE ON APPROPRIATIONS
 WASHINGTON, D.C. 20510

May 12, 1980

W.R. Hardy, WAC
 W. H. Harned, PI
 J. Chapin, Cgc
 RAB

Mr. Ralph R. Cowgill
 Director of Aviation
 Kanawha Airport
 Charleston, West Virginia 25311

Dear Ralph:

Enclosed please find the self-explanatory letter received today from Metropolitan Washington Airport Director James A. Wilding, in response to my recent correspondence bringing to the attention of appropriate officials your objection to the proposed 9:30 P.M. curfew under consideration for the Washington National Airport.

I am pleased to have had the opportunity to contact appropriate officials in the matter of Washington Airport's operation and to send this response.

With best wishes, I am

Sincerely yours,

Robert C. Byrd
 Robert C. Byrd

RCD:cgc
 Encl.



DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

METROPOLITAN WASHINGTON AIRPORTS
WASHINGTON NATIONAL AIRPORT
BANGOR 9
WASHINGTON, D.C. 20581



9 MAY 1980

The Honorable Robert C. Byrd
United States Senate
Washington, D.C. 20510

MAY 12 1980
RECEIVED

Dear Senator Byrd:

Thank you for your letter of April 14 which included correspondence from your constituent, Mr. Ralph Cowgill, Director of Aviation at Kenawa Airport. Mr. Cowgill has expressed concern in regard to a proposed operating policy for Washington National and Dulles International Airports.

Mr. Cowgill's views have been added to the record of public comment concerning the policy proposal. His testimony will be given full consideration prior to a final policy decision. Such a decision is not anticipated until later this summer. We are currently evaluating the docket of public comment received in response to the policy proposal.

Thank you for sharing your constituent's concerns with us.

I will notify you and your constituent of any final decision regarding the policy proposal. Please contact us again if we can be of further assistance.

Sincerely,

James A. Wilding
JAMES A. WILDING, Director
Metropolitan Washington Airports

Enclosure:
Constituent's Correspondence

NICK J. RAHALL, II
400 Canyon Building
Washington, D.C. 20515

COMMITTEE
PUBLIC WORKS AND
TRANSPORTATION

COMMITTEE
AVIATION
ECONOMIC DEVELOPMENT
SURFACE TRANSPORTATION

INTERIOR AND INDIAN AFFAIRS

COMMITTEE
MINES AND MINING
ENERGY AND DEVELOPMENT

Congress of the United States
House of Representatives
Washington, D.C. 20515

400 Canyon Building
Washington, D.C. 20515
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OFFICE OFFICE
615 FIFTH AVENUE
NEW YORK, NEW YORK 10011
(212) 512-1000

San Carlos
San Carlos, West Virginia 25801
(304) 352-0000

1000 Federal Building
Martinsburg, West Virginia 25801
(304) 352-0000

W. H. G. Building
Lynch, West Virginia 25901
(304) 793-4504

May 21, 1980

Mr. Ralph R. Cowgill
Kenawha Airport
Charleston, West Virginia 25311

Dear Mr. Cowgill:

I am enclosing for your review and information copies of my letter to the Federal Aviation Administration and that agency's response concerning the proposed regulations to change air service to Washington National Airport.

Knowing of your interest in this matter, and the effect it could have on air travel to and from West Virginia, I want to keep you advised of my actions in this regard.

Please feel free to call on me whenever I may be of service.

With warm regard, I am

Sincerely,

Nick J. Rahall, II
NICK J. RAHALL, II
Member of Congress

NJR/bjk

Enclosures



Send copies to: Mr. Howard B. [unclear] [unclear]

NICK J. RAHALL, II
8th District, West Virginia

COMMITTEE
PUBLIC WORKS AND
TRANSPORTATION

SUBCOMMITTEE
AIRPORTS
COMMERCIAL DEVELOPMENT
BUSINESS TRANSPORTATION

INTERIOR AND INSULAR AFFAIRS

SUBCOMMITTEE
MINES AND MINING
ENERGY AND ENVIRONMENT

Congress of the United States
House of Representatives
Washington, D.C. 20515

April 15, 1980

Mr. Langhorne M. Bond, Administrator
Federal Aviation Administration
800 Independence Avenue, S. W.
Washington, D. C. 20591

Dear Mr. Bond:

I am writing to express my objections to your proposed regulations which would phase out Washington National Airport by 1990, eventually, and more specifically, would change and limit service into that facility immediately.

Reducing carrier operations, and going to more wide-body jets would seriously threaten service to short and medium-haul traffic points, specifically airports in my home State of West Virginia. Washington National is an important hub airport for many persons, where they can connect to other flights. Loss of available travel to Washington will effectively cut off any type of airline service for many parts of rural America.

I hope, Mr. Bond, that every consideration will be given to the effect this ruling could have on my constituents, and all persons who count on Washington National Airport as a major facility. It is the small to mid-sized city which will suffer.

Thanking you in advance, I am

Sincerely,

NICK J. RAHALL, II
Member of Congress

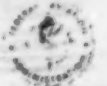
NJR/jeb

428 Capitol Building
Washington, D.C. 20515
(202) 555-3441
DISTRICT OFFICE
915 Fifth Avenue
Martinsburg, West Virginia 25701
(304) 622-6000
Room Building
Martinsburg, West Virginia 25701
(304) 622-6000
1000 Federal Building
Bluefield, West Virginia 25701
(304) 332-0333
P. O. Building
Lynch, West Virginia 25901
(304) 753-4933

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

RECEIVED
FACILITY OFFICE
MAY 12 10 10
8 AM

METROPOLITAN WASHINGTON AIRPORTS
WASHINGTON NATIONAL AIRPORT
BUILDING 6
WASHINGTON, D.C. 20001



The Honorable Nick J. Rahall, II
House of Representatives
Washington, D.C. 20515

Dear Mr. Rahall:

Thank you for your letter of April 15 expressing concern in regard to a proposed operating policy for Washington National and Dulles International Airports.

Your views have been added to the record of public comment concerning the policy proposal and will be given full consideration prior to a final policy decision. Such a decision is not anticipated until later this summer. We are currently evaluating the impact of public comment received in response to the policy proposal.

Thank you for sharing your thoughts with us. I will notify you of any final decision. Please contact me again if I can be of further assistance.

Sincerely,

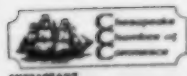
James A. Milner
JAMES A. MILNER, Director
Metropolitan Washington Airports



Area Cooperation Committee

Serving the community interests of 1,200,000 people

June 3, 1980



Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation, Public Works
and Transportation Committee
U. S. House of Representatives
2410 Rayburn Building
Washington, D. C. 20515

RE: "Washington National Airport
Operating Policy" Oversight
Hearings

Dear Mr. Anderson:

The Area Cooperation Committee is comprised of Chambers of Commerce in both the Newport News and Norfolk SMSA's, and represents in excess of 6,000 business members in the affiliated cities.

While most of the Chambers have responded individually to the FAA regarding proposed changes in the above named policy, we wish to go on record as an areawide body in opposition to the air perimeter mileage limitations being considered.

Over 1.3 million people are serviced in Southeast Virginia and Northeast North Carolina by Norfolk International Airport and Patrick Henry Airport. Last year, some 157,000 local passengers were served via the Newport News-Norfolk and Washington National Airport market. An additional 213,000 on-line and connecting passengers were served through Washington National.

Therefore, in the public interest of the 1.3 million people in our market area, and for the expressed need of our citizenry, business community and massive military community to have adequate access to the Nation's Capital, we urge that no action be taken to diminish reliable service to this crucial short-haul market.

Respectfully submitted,

Andrew S. Damiani
Andrew S. Damiani, Chairman
Areawide Highways/Transportation
Committee

AHD/sds



SENATE OF MARYLAND

ANNAPOLIS, MARYLAND 21401

HOWARD A. DENIS
STATE SENATOR
SIXTEENTH DISTRICT
MONTGOMERY COUNTY, MARYLAND

COMMITTEES
CONSTITUTIONAL AND PUBLIC LAW
MONTGOMERY COUNTY SELECT COMMITTEE

June 11, 1980

SUITE 700
7875 OLD GEORGETOWN ROAD
BETHESDA, MARYLAND 20814
857-3900

STATE OFFICE BUILDING
ROOM 409
TOLL FREE 281-1402
282-3279

Testimony of
State Senator Howard A. Denis

The Subcommittee on Aviation
Committee on
Public Works and Transportation

Re: The Department of Transportation's Proposed
Policy for Metropolitan Washington Airports

As the State Senator from the Bethesda area of Montgomery County, Maryland, I represent a large constituency that has been suffering the past decade from the air and noise pollution created by the existing facilities at National Airport. The present proposal to expand National and bring in an additional 200-plus flights a day would impose upon these long-suffering residents an enormous burden. In fact, an April 10, 1980, memorandum from the National Capital Planning Commission stated that "the Commission believes that the adverse environmental and other impacts on the Nation's Capitol of Washington National Airport, including operations thereat, warrant its discontinuance as a commercial airport at the earliest possible time....a timetable should provide for completion of phasing out by 1990. (NCPC Files nos. MP10 and MP26).

Testimony of
Senator Howard A. Denis
June 11, 1980

-2-

No one should underestimate the seriousness with which our community views this problem. Excessive noise is worse than esthetically displeasing -- it has adverse physical effects on people and property. I know of homes in the area where siding has been severely damaged by aircraft noise over a period of time. Birth defects have recently been added to other disorders linked to excessive noise levels. Some argue that civilization is inherently noisy. But the conventional wisdom is wrong. Excessive noise results from poor planning and simple lack of consideration, the very opposite of civilization.

Instead of increasing the flow of traffic into National, I urge the diversion of jet flights to Dulles, but especially to BWI. BWI is owned by the State of Maryland, and is the only airport in the country forced to compete with the only two federally subsidized airports. The name Baltimore-Washington International reflects its ideal location between two major cities. Not only would it be more convenient for easily half of the passengers now forced into Virginia, but depending on the time of day, it could be quicker even for those whose destination is northwest Washington.

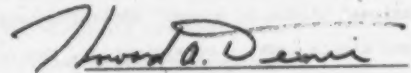
And BWI wants the business! The State of Maryland has recently spend millions of dollars to modernize the terminal and the facilities. The Federal Aviation Administration has assured me that they hope to finalize a policy this summer that would result in a greater utilization of BWI and Dulles Airports.

Testimony of
Senator Howard A. Denis
June 11, 1980

-3-

It is my sincere hope that Congress will do what it knows to be basically fair. The citizens living along the Potomac should not be treated as if they were a hostile foreign power. They are our people, and deserve substantial relief -- not additional grief -- from the aircraft noise that now afflicts their daily lives.

Thank you.



Howard A. Denis
State Senator
16th District, Maryland

Statement to
The Subcommittee on Aviation
House Committee on Public Works and Transportation

Michael F.H.Dennis
Vice President Navy Vale Community League

12 June 1980

Metropolitan Airports Policy Draft E.I.S.

The Navy Vale community are the South Eastern neighbors of Dulles. The area is characterized by low density residential development. We live on small houses on large lots. We form a stable community (average house building date 1953) which has an average income somewhat lower than the norm for the western portions of Fairfax County.

We view this opportunity to appear at these hearings as an opportunity to overcome past discriminatory practices on the part of FAA. There has been much contact with the communities surrounding National but none with us. I would point out that little contact appears to have been made with the neighbors of BWI.

We believe that there has been much confusion as to the issues involved. As we understand it, there are three main areas of concern - Safety, noise, traffic impact.

In any air operation, safety is the bottom line. However, given the dense areas of population around National, surely one should remember that Commercial aviation has a safety record far superior to commuter and general aviation. Thus, there would appear to be an argument for the restriction of National to commercial flights with commuter and general aviation being routed to other airports in the region.

In the area of noise, the lack of outreach to our community produced several errors of fact with respect to Dulles:-

- a. The flight tracks from Runway 12 are misrepresented in Exhibit III-10. Take offs, including Concord, do not make a hard right but rather swing south some 32000 feet out.
- b. Exhibits III-11, III-12 ignore much of the settlement of our community. Low density does not mean an area is uninhabited.
- c. Exhibit III-12 is specious in that it ignores the twinning of runway 12/30 planned for 1995 and that ignores development committed and approved which will have occurred by 1990. The 1990 population will be far greater than that of 1980.
- d. The FAA believes the area to consist of "rural undeveloped land" (pp III-30, III-34)

This ignores the fact that the area is the locale of a highly noise sensitive industry - the care and breeding of horses. In 1979 there were 4000 horses in Fairfax County, concentrated in the Western part of the County. These represented an investment of \$190 million and employed some 500 persons.

Many of these horses (900) are Thoroughbreds - highly nervous, excitable animals whose value is in almost direct proportion to their excitability. They react strongly to sudden loud noises so that the event of a low flying aircraft could represent considerable loss - especially in the case of a brood mare.

With regard to traffic we would note that under Virginia law, traffic is the responsibility of the community. Virginia Department of Highways and transportation decides the need for road improvements and funds them. For FAA to take it upon itself to undertake this function is an intrusion on the prerogatives of the Commonwealth. Even if one concedes FAA this right, we would note that local roads around Dulles are ignored. Exhibits III-14 and III-15 assume that Dulles traffic will affect only the Dulles Access Road and Virginia Route 28. There is no apparent concern for what happens to this traffic - the impact on roads in the area surrounding that airport. This contrasts with the concern shown for local roads around National airport.

As far as passenger growth goes, we believe that terminal redesign and expansion could take place as easily at National as at Dulles.

We further believe that not enough attention is given to the opportunities offered by quieter wide body aircraft and by new ultra quiet turboprops. We believe that they would allow for an increase in passenger volume while still allowing a reduction in total noise emission at National.

We would finally raise the question of the propriety of the FAA competing with the state subsidized BWI. Why should the Federal government subsidize National and Dulles in competition with the government of the State of Maryland.

March 27, 1980

COMMENTS ON FAA'S PROPOSED POLICY FOR WASHINGTON AIRPORTS AND
SUPPLEMENT TO THE EIS (JANUARY 15, 1980)

My name is Joseph C. Doherty. I live five and one half miles south of National Airport near the so-called Potomac River preferred approach and departure path established by FAA. I do not represent an organization. I am making this statement as an individual citizen because the environment of the neighborhood I live in is degraded by overflights of turbojets landing at and taking off from National Airport.

I have submitted a detailed statement in writing to FAA on the agency's proposed operating policy for Washington airports. To save time, I'll merely summarize here what I consider contradictions and gaps in the EIS Supplement of January 15, 1980.

On page II-6 of the Supplement, it is stated DOT considered certain basic "policy objectives" in developing a long-range proposal for operating Washington airports. Let us see how the DOT objectives are ignored or made meaningless by the FAA proposal. To take them one by one:

Objective: To rationalize airport use from an overall transportation viewpoint. Under the FAA proposal, National Airport will remain by far the airport of greatest air carrier activity and number of passengers processed, even though its location and facilities should make it the airport of least activity. This does not appear to be "rational," by any definition.

Objective: To eliminate constraints on use of airport equipment. FAA's proposed plan for National would require upgrading of existing equipment and installation of new and more expensive

more

COMMENT ON WASHINGTON AIRPORT POLICY, Page 2

equipment. Therefore, this policy objective is simply meaningless insofar as National's presently overburdened facilities are concerned.

Objective: To achieve fuller use of existing and planned airport capacity. Dulles and BWI have existing capacity that could serve an increased traffic load with little modification or upgrading. In addition, expansion at Dulles would be more suitable from a space and surface access standpoint than at National.

Objective: To ensure airport expansion and operation are compatible with community expectations, especially concerning a better environment. Two years ago the Washington Council of Governments, representing the regional community, called for a 50 percent reduction in air carrier slots at National by 1985 to reduce noise, air pollution, and surface congestion. The proposed FAA operating policy would bring about landside expansion and increased passenger traffic at National Airport. It would increase environmental degradation in the surrounding neighborhoods, not lessen it.

Objective: To plan for and implement only those improvements at National consistent with its role. This is not so much contradictory as meaningless. FAA has determined National Airport shall be the premier airport of the region, handling by far the largest amount of passenger traffic. Given this premise, the amount of road and facility construction that could go forward at and around National is nearly unlimited.

So much for the underlying policies of DOT when the reality of the FAA proposals are applied to them.

more

COMMENT ON WASHINGTON AIRPORT POLICY, Page 3

As to missing elements in the EIS Supplement released January 15, 1980, the following are among the more obvious:

One, there is no estimate of the amount of increased air pollution caused by turbojet exhaust gases and carbon emissions resulting from the introduction of wide body jets and a greater mix of commuter flights.

Two, there is no estimate of excess energy costs due to the expenditure of jet fuel necessary in following preferential approach and departure paths.

Three, there is no estimate of excess energy costs due to householders in impacted neighborhoods using airconditioning when it is not needed for cooling to close out the sound and exhaust pollution of overflying turbojets.

Four, there is no reference to specific medical and psychological effects of noise on people living in airport impacted neighborhoods, such as those surrounding National Airport, either a citation of previous studies or sample surveys taken in these neighborhoods.

Because of these contradictions and missing parts, I don't believe either the proposed Washington airports operational policy or the EIS Supplement could withstand court challenges. The Supplement does not deal with key individual, environmental, and energy questions essential to its purpose. The operational policy being proposed ignores basic objectives adopted and stated by DOT itself. Whether the citizens affected by expanded operations at National Airport, which FAA is proposing, will go forward with such a court challenge (or challenges) remains to be seen. Certainly the FAA has given them every provocation to do so.

END

J. C. Doherty

Overflight, Oversight

Secretary of Transportation Will Goldschmidt's proposals for the operation of National Airport offer the citizens who live in the shadows of the airplanes a little hope, a lot of despair—and no say in how the airport operates.

His plan calls for reduction of takeoffs and landings by the big commercial jets to around 470 per day. At the same time, short haul commercial operations will be increased, and the service range of National moved out some 350 miles. Larger airplanes will also be allowed in and out of the airport.

The secretary and his Federal Aviation Administration assistants should have saved themselves the trouble, for their plan isn't likely to reduce pressure on the neighborhoods surrounding National. In fact, it may make things worse. Increasing the number of short haul commercial and business jets won't reduce noise levels. The smaller planes can be as offensive to the groundlings as the big commercial jets. Only the pitch and tone are different. The former gives off a high-pitched shriek; the latter, a thunderous roar. It's merely the difference between a police whistle and a kettle drum, magnified a thousandfold, of course.

Permitting jumbo jets to use National and increasing the airport's operational range will only help build pressure to extend and enlarge facilities over the years. This part of the plan also will add to ground pollution (i.e., more road building, more auto congestion) as well as air pollution. Reducing big jet commercial flights to 470 or so during a 14½-hour day is scarcely

"The plan says nothing about incorporating the interests of the neighborhoods into the operation of the airport as official and standard procedure."

worth the effort. A big plane will still take off or land every 1.78 minutes from 7 a.m. to 9:30 p.m. Meanwhile, private and commercial commuter traffic will be permitted to increase, presumably landing and taking off during the 1.78-minute intervals when the big planes are on the ground or approaching.

But the plan has an even more important flaw, for it says nothing about incorporating the interests of the surrounding neighborhoods into the operation of the airport as official and standard procedure. It doesn't recognize that people living under the airplanes represent a third interested party, along with the U.S. government and the airport users, both commercial and private. The people in the impacted neighborhoods pay a huge part of the cost, which economists call "externalities," of National's being so convenient and active. They therefore should have a right to participate in the operation of the airport.

In the past, informal groups representing people who suffer from airplane noise and pollution generated at National have tried to express this neighborhood interest and concern. Yet in the face of FAA indifference and airline complacency, they could only seek relief in the courts, a slow and disheartening process.

The long-range plan for National Airport needs to include a provision ensuring that representatives of neighborhoods affected by National will have a role in the operation of the airport. This means they must be given access on an official basis to decision-making about operational plans and policies. It means providing them regularly with information that will permit them to determine whether agreed upon, noise- and pollution-control procedures, traffic control and safety measures, limitations on facilities expansion, and other aspects of day-to-day operations are measuring up to DOT-FAA promises.

Without such a provision, the plan will simply result in more business as usual at National, which is to say day-to-day control and decision-making by the two parties—the government and the carriers—that have a vast political and economic interest in growth and expansion. For the surrounding neighborhoods, this can only mean more noise, more jet stream pollution and more danger from the kind of congestion that produces accidents.

Regular and official citizen involvement wouldn't make National go away, but would, at least, civilize it a bit.

J. C. Doherty, a Washington writer, lives near National Airport.

April 9-April 15, 1969

Epistles to the Packet

Dear Packet,

This is to protest the lack of coverage by your newspaper of probably the most critical issue facing Old Town Alexandria and adjoining neighborhoods: The FAA plan to expand operations at National Airport and the COG deliberations over future Potomac River flight patterns followed by planes taking off and landing at National.

With the exception of one front page interview with Mayor Beasley, who was highly critical of National expansion, The Packet to my knowledge has ignored the National story. You gave no coverage of the two local FAA hearings or the COG hearing, all of which took place in March, in spite of participation by Alexandria representatives, including Mayor Beasley. Your paper has carried some of the features and backgrounds that would seem obvious, in fact, mandatory, given a story of this importance to your readers.

The FAA preferred plan will result in larger airplanes coming into National, i.e. landing and taking off over Old Town; an extension of the distance airplanes flying out of and into National may travel; increased light plane traffic; an increase in the number of passengers handled by 5 million; enlargement of auto traffic capacity on the ground; and construction of run ways out into the Potomac River.

The impact of all this on Alexandria neighborhoods, particularly those east of the Washington Parkway, and on the two principal traffic routes into Washington used by Alexandria residents will be serious and permanent. I realize the Alexandria business community, as represented by the Chamber of Commerce, supports continued expansion of facilities at National Airport and that The Packet is tied closely to this community. Nevertheless, there is another side to the story, i.e. the heavy price in noise, air pollution, accident hazard, and ground congestion citizens of Alexandria will be required to pay as a result of the FAA expansion plans for National Airport.

The Packet has failed its readers and raised serious questions about its own news judgment by ignoring, for the most part, the most important issue facing Alexandria at this time.

Sincerely,

Joseph C. Doherty

(Reader Doherty is certainly entitled to his own opinion about the relative importance of issues facing the city. So is The Packet, thank goodness.)

April 15-April 22, 1969

Dear Packet,

Fis on The Packet for its smug out-of-hand rejection of Mr. Doherty's cogent, reasoned, and relevant criticism of your treatment of the National Airport noise pollution issue.

Your reaction, though disappointing, is not surprising. There has been surprisingly little attention given to presenting a full background on an issue which increasingly will impact adversely on the very quality of life in Alexandria which we seek to preserve.

Obviously, airport noise pollution is not the most important issue in Alexandria. The inability, or unwillingness, of the city administration and the council, to stop the growth of the city budget certainly takes precedence.

However, airport noise pollution would seem to merit equal priority with running free advertising polls in your paper about the popularity of our bars and restaurants — which themselves contribute to noise pollution, according to many.

I sometimes think it's a pity that newspapers don't have to be read aloud to be understood. Perhaps then they would be more sensitive to the importance of the issue outlined by Mr. Doherty and would be more inclined to take a leadership position in effecting a solution of benefit for the community.

Once again, for shame—for shame—for shame!

Sincerely yours,
William B. Miller



LAMBERT-ST. LOUIS INTERNATIONAL AIRPORT

City of St. Louis Airport Authority / P.O. Box 10036 • St. Louis, Missouri 63145 • Telephone (314) 426-7777

Leonard L. Griggs, Jr.
Chairman
Airport Commission

June 4, 1980



James F. Conaway
Mayor
City of St. Louis

The Honorable Glenn M. Anderson
House of Representatives
2410 Rayburn Building
Washington, D.C. 20515

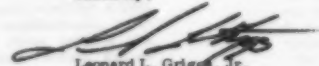
Dear Congressman Anderson:

The purpose of this letter is to express concern regarding the Department of Transportation's policy proposal which would further restrict the availability of air service at Washington National Airport. The City of St. Louis relies heavily on its service to National. To reduce the number of slots available to air carriers would surely force St. Louis travelers to use less convenient (and more congested) facilities. Additionally, since St. Louis is the farthest point west which currently has nonstop service into National, a reduction in the number of St. Louis services will force passengers traveling to or from cities farther west to use less convenient gateways. Those passengers that would still be able to travel via St. Louis would occupy a greater percentage of St. Louis' seats, thus making it more difficult if not impossible for the carriers to accommodate St. Louis' needs in the market.

Although the City of St. Louis would prefer that no change be mandated by the Department of Transportation with regards to the level of operations which currently exist at National, if a slot reduction must be made, the City would prefer that the Air Transport Association's (ATA) proposal be adopted. The two suggestions offered by the Department of Transportation's Federal Aviation Administration would adversely impact National's ability to serve the traveling public.

In summary, the City of St. Louis respectfully requests that every possible consideration be given to the ATA's proposal. The availability of a high level of service in the St. Louis-Washington (National) market is vital to the continued economic growth of not only St. Louis, but a great many other cities in Missouri and states farther west. We sincerely hope that your committee recommends that the Department of Transportation adopt the ATA's slot allocation proposal which will limit the negative impact that a slot reduction will create.

Sincerely,



Leonard L. Griggs, Jr.
Director of Airports

LLG/pab



Metropolitan Milwaukee Association of Commerce

756 NORTH MILWAUKEE STREET, MILWAUKEE, WISCONSIN 53202 (414) 273-3000

May 27, 1980

Honorable Glenn M. Anderson
Chairman
Subcommittee on Aviation
Public Works and Transportation
Committee
U. S. House of Representatives
Washington, D.C. 20515

Dear Representative Anderson:

The loss of slots and reduction of slots per hour at Washington National Airport is strongly opposed. National is more than a typical airport. It serves the nation and is vital to the interests of all Americans. The negative impacts of air traffic and noise congestion are minor by comparison to the national interest. We do not need a "showcase" as much as a functional facility that serves the people of the United States.

The Milwaukee business and governmental community have attempted to obtain additional service to National. A survey conducted by the Metropolitan Milwaukee Association of Commerce in November, 1979 showed that Washington, D.C. is the second poorest air service market from Milwaukee. The Milwaukee area currently has only one A.M. area nonstop to National and one P.M. nonstop from National, with a need for additional, not less service.

Sincerely,

John Duncan
John Duncan
President

JD/mlm


BATON ROUGE AREA CHAMBER OF COMMERCE

P. O. BOX 1080 / 104 LAUREL STREET / BATON ROUGE, LOUISIANA 70801 / PHONE (504) 387-1400

May 29, 1980

The Honorable Glenn M. Anderson
 Chairman, Subcommittee on Aviation
 Public Works and Transportation Committee
 U. S. House of Representatives
 Washington, D.C. 20515

Dear Congressman Anderson:

It is our understanding that the Aviation Subcommittee will conduct oversight hearings on the Federal Aviation Administration's proposed policy with respect to curtailment of operations at Washington National Airport.

Since it is not possible for this organization to be represented to testify at these hearings, we respectfully request that our views concerning the FAA's proposal be entered into the record by means of this communication.

The Baton Rouge Area Chamber of Commerce, by unanimous decision of its Board of Directors, stands in opposition of the proposed policy of the FAA with respect to the curtailment of operations at Washington National. The basis for the proposed curtailment as stated is primarily an environmental improvement concern. In our opinion this does not substantiate the reduction of commercial airline operations by 18% and the prohibition of all but emergency operations after 9:30 p.m. daily. Washington National Airport is vital to travelers from the South and Baton Rouge being Louisiana's capital city has a very substantial community of interest with the Nation's Capital.

We ask that the Aviation Subcommittee act favorably on our request that the proposed policy of the FAA with respect to limiting passenger access to Washington National be denied.

Sincerely,

Victor J. Ehr
 Executive Vice President

VJE/dwr

14 April 1980

Department of Transportation,
Federal Aviation Administration,
The Director, Metropolitan Washington
Airports, Hangar 9,
Washington National Airport,
Washington, DC 20001

Dear Mr. Wilding,

Reference: Supplement to the Draft Environmental Impact Statement,
Metropolitan Washington Airports Policy Statement, January 1980.

This letter treats some of the common views of your neighbors
who reside in the community of River Park, in the South West of
the District of Columbia. 

In general, the Supplement appears to have been a serious study
in accordance with the stated policy objectives (page II-6) and
we support the purpose of the Federal actions (II-8,-9); however,
serious errors are contained in the Supplement and we wish to call
attention to these and make other recommendations as well.

More specifically, we would call attention to the failure to
measure and otherwise assess the impact of noise in the River Park
area. The experienced noise caused by aircraft is unacceptably
high, here in the South West. Aircraft routinely fly well out-
side the parameters described in the Supplement as NFP-46 (Exhibit
III-4 and elsewhere), often overflying the residential area between
M Street SW and Fort McNair. The perceived altitudes of these
overflights seems to be unnecessarily low. It is our understanding
that these offending overflights are usually northbound departing
jet aircraft whose Pilots-in-Command request (and are routinely
granted) right turn-outs after departing from runway 36; your
Exhibit III-2 is clearly misleading.

Accordingly, it is our view that the Supplement should also pro-
vide for procedures and policy adjustments in keeping with your
Policy Objective 4. (page II-6), noting other statements in the
Supplement (para 4., page II-9). Necessary procedures and policy
adjustments should include:

--Approaches to/departures from Washington National
should be permitted only over the Potomac and Anacostia rivers
for reasons of safety and noise abatement.

--Such approaches and departures should be made
at the maximum angle of attack (climb or descent) within the
safety limits of the aircraft for reasons of noise abatement.

--Turn-outs from or to the approach/departure corridors should be permitted only when aircraft are above 2500' (MSL) altitude for reasons of noise abatement. (It should be understood that the aircraft should also be in cruise configuration, i.e., with drag and noise producing elements retracted as appropriate, including leading slats, flaps, landing gear and doors, etc.)

--Turn-outs over residential areas should not be permitted where aircraft have not cleared 2500' or which cannot maintain climb or descent in the approach/departure corridors over the Potomac and Anacostia rivers.

--Limitations on air operations should not adversely affect air transport service, but should be restricted to provide residents with reasonable peace and quiet, particularly at night and on Sunday.

--Jet aircraft departures and arrivals should be limited to 0700-2200 (7 AM to 10 PM), and all other aircraft departures to be so limited as well.

--Air operations on Sundays should be similarly limited to the hours of 1200-2200 (Noon to 10 PM).

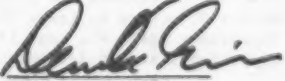
--The Restricted Growth Policy option could be acceptable wherein a Zero Growth or FY 79 performance levels of service is permitted (no more than 15M upper limit of all passengers) along with other recommendations herein.

-The NEF 30 dogleg over residential areas of the SW should be eliminated.

-Transportation means to outlying airports, such as METRO extension to Dulles, should be enabled, and greater use of National by general aviation as well as other "quieter" commercial aircraft, should be encouraged.

We would appreciate hearing further from you in this regard and hope our views will be favorably considered.

FOR THE RIVER PARK COMMITTEE ON AIRCRAFT NOISE POLLUTION


David A. Ellis,
Member

1344 Fourth Street, SW
Washington, DC 20024

747

INTERIM REPORT

BY

FEDERAL CITY COUNCIL TASK FORCE
ON
NATIONAL AIRPORT

June 24, 1980

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EXECUTIVE SUMMARY

In January, 1980, U.S. Department of Transportation Secretary Goldschmidt proposed operating rules for National Airport which would sharply limit its growth, reduce noise, alter the mix of aircraft, eliminate late night operations, and possibly increase the number of cities served. The purpose of these rules and the accompanying environmental impact assessment was to define operating limits which will allow master planning for physical improvement of the Airport's facilities.

The Federal City Council offered to play a facilitating role in bringing about some consensus on the Airport's future. Since early this year, a Task Force of forty Council members has been involved in an intensive examination of the issues and options. More than two dozen meetings have been held with government officials and representatives of citizen groups, private aircraft owners and operators, and airline organizations. Orientation visits have been made to the three major regional airports and over 900 pages of background material have been reviewed. The Task Force has focused on the proposed rules, preliminary plans for physical redevelopment and financing alternatives.

As a result of this review, the Task Force believes the FAA's proposed rules for National Airport's operation reasonably accommodate the competing interests at stake -- significantly reducing noise while setting the stage for more convenient passenger service. A passenger ceiling should be set somewhere between 16 and 18 million passengers annually. National should primarily serve short haul traffic from relatively nearby cities. When two flights are competing for the same slot, the shorter flight should have priority.

To maintain the new annual limit in the face of increasing demand, the frequency of major airline flights should be reduced through cut-backs in slot allocations and admittance of wide-bodied aircraft, after demonstration of their ability to operate safely at National under adverse weather conditions. Commuter aircraft, generally serving close-in communities, should be awarded up to seven additional slots on an as-needed basis. Construction of additional general aviation facilities at Dulles should be expedited and shared use of existing facilities at Andrews AFB, Davison Airfield, and the Beltsville Agricultural Research Center should be explored.

The proposed 10:30 p.m. closing time for all aircraft operations should be implemented, although scheduled aircraft that depart in time to land at National before 10:30 but are delayed enroute should be allowed to land. The Task Force believes the perimeter rule is probably no longer necessary because airplane limitations, the annual passenger limit, fewer airline slots, and a short haul preference rule -- if adopted -- will serve to limit traffic into the Airport. If one is to be kept, however, the existing 650 mile perimeter with seven grandfathered exemptions is a reasonable one, as demand sometimes already exceeds the number of available slots.

Improvements in the physical condition of Airport facilities to better accommodate both aircraft and passengers should be made as quickly as possible, with costs recovered over time through user charges.

BACKGROUND

National Airport is unique. It is the primary airport serving the Nation's Capital. It serves more than local residents. It also contributes to the efficient functioning of the Federal government -- those who work for it and those who deal with it. It is Federally owned and operated, but has a major impact on the social and economic life of the entire Metropolitan area. Therefore, decisions about its operation have broad effects -- both locally and nationally.

A number of problems exist with respect to this facility. Although it is conveniently located for many people, National Airport is noisy, congested, and unattractive. People disagree on how many and what kinds of planes should use it, when those planes should use it, how the Airport should be managed, and even whether it should continue to exist. Most people agree, however, that if it remains open then physical improvements are needed to permit more efficient use by both airplanes and travelers.

In January of this year, Secretary of Transportation Neil Goldschmidt proposed new operating rules for National Airport. These rules are intended to define the role of National in the Washington metropolitan area, to respond to legitimate concerns for less aircraft noise in the Airport's flight path, and to lay the groundwork for the Airport's physical redevelopment.

FEDERAL CITY COUNCIL INVOLVEMENT

This situation presents an opportunity for an organization such as the Federal City Council to play a facilitating role in helping to work out an acceptable course of action. The basic nature of the problem involves a Federal interest entwined with local interests, on an issue related to improving the quality of life in the Nation's Capital. The Federal City Council, as a private organization of business and civic leaders, has a history of successful involvement in similar kinds of projects. Its members represent a broad range of interests and experience in both the private and public sectors. They not only have access to short range expertise -- but also provide a valuable longer range perspective.

Since early this year, forty members of the Council have been involved in learning about the issues and options associated with National Airport. This Task Force has consisted of three Committees: one dealing with the pending operating policies being considered for National by the U.S. Department of Transportation; one dealing with physical improvements at the Airport; and one dealing with methods of financing such improvements. (See Exhibit I for a listing of the Task Force members.)

Members of these committees have had more than two dozen meetings with Federal, state and local officials, and with representatives of citizens' organizations and various airline user groups. Special orientation visits have been made to the three major regional airports, and approximately 900 pages of background material have been reviewed.

The Task Force is prepared at this time to offer some preliminary thoughts with respect to National Airport. We expect to monitor closely future policy proposals and the Master Planning process, and to support development of a comprehensive program for upgrading facilities at both National and Dulles Airports.

SOME CHARACTERISTICS OF NATIONAL AIRPORT

It was built in 1941 on 860 acres, 4.5 miles from downtown. This year, 15.5 million people are expected to use it, involving approximately 600 commercial, 300 general aviation, and 150 commuter flights per day. This volume represents approximately 67% of all air traffic at the three major regional airports. In 1979, National handled approximately 15 million people, Dulles 3.5 million, and BWI 3.8 million. National is the 11th busiest airport in the country in terms of passengers, 26th in the number of aircraft handled, and has the busiest single runway. (See Exhibits II, III, IV and V for further comparative data.)

UNDERLYING ISSUES

1. How to reduce noise and air pollution affecting the surrounding community, and by how much.
2. How to limit congestion at National and encourage greater use of Dulles and Baltimore/Washington International (BWI), which are operating below their capacities.
3. How to accommodate increasing demand from air travelers who prefer National as more convenient for tourist, business and government purposes.
4. How to improve and upgrade physical and other facilities at National -- including baggage areas, roadway access and parking, the connection to Metro, concessions and taxi service.
5. How to finance improvements and encourage efficient management.

CURRENT POLICY

National's limited size and heavy congestion led the FAA in 1969 to impose a number of restrictions:

1. Only 60 slots per hour for aircraft landings or takeoffs are allocated during periods of poor visibility when Instrument Flight Rule conditions prevail -- 40 for air carriers, 12 for general aviation and 8 for commuter aircraft. These limits are sometimes exceeded to permit extra sections for scheduled carriers (e.g. the

Eastern Shuttle). Also, up to 30 general aviation flights per hour sometimes occur at the controllers' discretion during periods of good visibility (VFR conditions). The Airport is under VFR conditions approximately 80% of the time.

2. There are voluntary limits on operating hours -- no jet flights are scheduled after 10:00 p.m., and all jet flights are discouraged between 11:00 p.m. and 7:00 a.m. However, 20 flights are currently scheduled at 10:00 p.m. which results in a backlog that can take an hour to clear up, and sometimes more than a dozen private planes fly in or out during the night.
3. No wide-bodied aircraft are permitted.
4. There is a 650 mile perimeter limit on non-stop flights except for seven cities that were already being served when the limit was established in 1966 (St. Louis, Memphis, Minneapolis, Tampa, Orlando, West Palm Beach and Miami). (Exhibit VI shows the geographic coverage of alternative perimeter limits.)

FAA PROPOSED POLICY FOR NATIONAL AIRPORT

1. The proposed policy: a) limits the annual number of passengers to 16 million; b) reduces hourly air carrier slots from 40 to 36 and assigns these four slots to the commuter airlines; c) may reduce general aviation slots from 12 to 9 and assign those three slots to the commuters; d) imposes a curfew between 10:30 p.m. and 7:00 a.m. and forbids scheduling airline and commuter activity after 9:30 p.m.; e) may increase the perimeter for non-stop flights to 1,000 miles; and f) permits some wide-bodied aircraft operations.
2. It attempts to balance the various competing interests and concerns by allowing approximately a 20% growth in passenger traffic through the use of wide-bodied aircraft and more commuter flights, but with 20% fewer major air carrier operations, which will reduce noise and divert future additional demand to Dulles and BWI.
3. It replaces current practices with new rules, based on an environmental impact statement and public hearings, to be adopted in August 1980 and implemented in January 1981.
4. A formal resolution of the issues under contention is necessary to: a) comply with a court decision requiring a justification of the future plans for National; b) provide clear policy guidance to the various components of the airline industry for their future operations; and c) permit planning to proceed for needed physical improvements at both National and Dulles.

**ISSUES AND
DISCUSSION**

In the course of the Task Force investigation, a number of concerns were expressed by government agencies, citizens and user groups. Some were specifically directed at the proposed rules. Others were more general in nature. This section summarizes the concerns expressed to us and provides some response based on Task Force findings and deliberations. (For a one-page summary of various points of view on the proposed rules, see Exhibit VII.)

CITIZEN GROUP CONCERNS

1. The noise generated by planes at National Airport is regarded by many people as being too loud, too frequent and occurring too late in the evening. Some feel it is unfairly concentrated over the same area all of the time and that the proposed policy does not go far enough to alleviate this problem.

Response: The proposed FAA policy will mean fewer jets per hour and an earlier nighttime curfew. Together with the phasing in of stricter Federal noise standards, these policies will result in considerably less disturbance to area residents. FAA is also willing to test a greater number of takeoff patterns than the one currently being used, but local citizens and government agencies are not in agreement among themselves on which additional areas should be flown over.

2. The Airport generates air pollution in an area already exceeding Federal air quality standards. This additional pollution is caused both by aircraft flying over the same flight paths and by automobile traffic to and from the Airport.

Response: The newer generation of aircraft is more fuel efficient and less polluting. Simply moving airplane flights to other airports will only move the pollution with it and, if longer auto trips are required, there may actually be a net increase in automobile energy consumption and pollution. A rebuilt National Airport will be more convenient and better served by Metro. Auto circulation can be improved and, with more efficient auto engines and better emission control devices, automobile pollution generated by National Airport traffic should not be a significant problem.

3. The Airport is unsafe because it has too much air congestion, too short a runway and is too close to a densely settled urban area.

Response: The FAA, the Federal agency charged with promoting air safety, operates the Airport. It has limited the number of total flights per hour to 60 under IFR conditions. The total number

of scheduled commercial flights has actually decreased slightly during the past twenty years. Private general aviation flights have increased, but most of these flights involve fully qualified professional pilots. A 500 foot safety overrun has been proposed for the main runway. The actual Airport safety record has been excellent and navigational equipment is continuing to improve. In the event of engine failure or some other emergency, the flight path along the Potomac River and adjacent parklands would provide emergency landing areas away from built-up neighborhoods. However, further testing may be appropriate to assure that wide-bodied aircraft can operate safely at National under adverse weather conditions.

4. The past public investment at Dulles and BWI is being wasted because the airlines are not willing to move, or duplicate, service there as long as the greater convenience of National Airport is available to them.

Response: The proposed FAA policy is responsive to this concern. It would place a ceiling on annual passenger volume at National, thereby diverting future growth to Dulles and BWI. The outlying airports are being made more convenient: improved bus service is being developed to Dulles along the Dulles access road and the new I-66, and to BWI along the Baltimore/Washington expressway. Continuing development patterns will also lead naturally to shifts of service by the airlines to Dulles and BWI as warranted by market demand.

USER CONCERNS

1. There is need for greater Airport capacity to serve a growing national and international demand for travel to the Nation's Capital, by all classes of travelers and types of aircraft. At the present time, National is served by 13 major commercial carriers, 9 commuter airlines, and an indeterminate number of general aviation aircraft. Federal deregulation and the continued growth of Washington as a business, as well as governmental, center should cause these numbers to grow. New navigational and air traffic control technology would permit increased use of National above current fixed levels.

Response: Because of physical limitations and environmental concerns, as well as policy considerations, FAA is proposing to limit future growth at National to 20% above 1979 levels and to shift additional traffic to Dulles and BWI where ample capacity exists to serve the Washington regional market. Wide-bodied commercial jet aircraft are to be permitted at National under the proposed FAA policy to service heavy demand cities with fewer aircraft. Slots are to be re-allocated to permit growth by commuter airlines serving markets that are relatively less feasible for economic service by major air carriers.

2. The earlier curfew at National will reduce the number of connections that can be made with cities to the west, for both travelers and mail, and may serve as a precedent that would lead to a reduction in service at other cities as well.

Response: This region is in the fortunate position of having three major airports. Closing National at 10:30 p.m. will cause some inconvenience but little hardship. Dulles and BWI will continue to be available for long haul and nighttime connections, as demanded by the market. The Task Force does not believe that the establishment of a more formal, and earlier, closing time will endanger Washington commerce. This action by the FAA, as the owners of the Airport, however, should not be construed as a precedent for other cities. The Task Force feels that voluntary limitations, such as those that have been in effect at National, are generally preferable. In this case, though, the package of proposed rules has been balanced so carefully that the Task Force accepts the mandatory closing as an integral and necessary part of the plan to achieve approval for improved and more efficient facilities at the Airport. National's in-town location and the availability of two alternative airports makes this case unique.

3. Better ground facilities are needed for baggage handling, passenger access, concessions and other consumer services, and servicing of wide-bodied aircraft.

Response: We agree. These rules have been proposed, in large part, in order to obtain the necessary public approvals for such new or improved physical facilities in and around the terminals. The Task Force intends to continue to monitor and comment on the development of such plans.

4. The current process of allocating aircraft slots among the scheduled air carriers involves two private industry committees -- one for the major airlines and one for the commuters -- and an exemption from the general antitrust statutes. The process is becoming more difficult under Federal airline deregulation, but is preferred by the airlines over the bidding process currently being considered by the Government.

Response: Though not expressing an opinion on all of the complex legal and economic questions raised by the alternative methods of slot allocation, it seems to the Task Force that the FAA might adopt a policy of giving preference to the shorter of two flights competing for the same slot. This would involve a modification of the current procedure, but would be consistent with the proposed rules and would further implement the short haul policy preference at National.

5. Other concerns about slot allocation include:

- a. The major air carriers would like more flexibility to reflect actual demand conditions rather than a single fixed number of slots per hour. Also, the airlines propose that connecting passengers not be counted as part of the total annual passenger limit.

Response: The FAA should consider whether the public might be best served if the airlines were allowed a few extra slots during the week (but within the proposed new operating hours) in exchange for surrendering slots on the weekends. This would allow for a maximum use of the close-in facility by persons doing business with the Government and might lead to significant noise reduction on the weekends when people are out of doors -- on the Mall and elsewhere. The exclusion of connecting passengers for the 18 million ceiling would result, as a practical matter, in a total passenger volume at National of nearly 23 million and would further delay more productive use of Dulles and BWI.

- b. Commuter aircraft (less than 36 seats) are mostly propeller driven and thus less noisy. They generally provide service within a 250 mile radius and 75% of their passengers connect with major carriers. Because of these factors, the commuter airlines would like an extra hour of operating time before and after the limits for major commercial jets. Also, the new generation of STOL (short takeoff and landing) aircraft are able to use cross runways and may not need to compete with major carriers for slots on the main runway.

Response: More slots will be provided by the rules, but not more time. The curfew applies to all. This may be inconvenient but it need not be an impossible situation if the airlines and the commuters coordinate their services more closely. Despite the technological advances in STOL aircraft, the Task Force feels that safety concerns will probably not allow for unrestricted use of cross runways.

- c. Private general aviation is growing at a faster rate than other kinds of air travel. Between 1972 and 1979, the number of general aviation flights at National grew by more than 15,000 while the number of major commercial flights declined by 11,872. General aviation planes are usually less noisy, serve special business purposes where time is at a premium and are generally capable of using the shorter cross runways. But, this category of users is concerned about being squeezed out by the commercial airlines, including commuters, whose aircraft carry more passengers per trip and therefore appear to be more cost effective in their use of the Airport's limited capacity.

Response: Under the proposed rules, general aviation travelers will retain at least nine of the twelve slots reserved for them currently. In addition, they can obtain special slots above their formal limit when weather conditions permit, which is 80% of the time. Also, they are more flexible in their scheduling needs and have other options at Dulles and BWI. But this region must plan for additional general aviation facilities. Dulles can and should be expanded to accommodate more general aviation use on an expedited basis. Explorations should continue as well into the shared use of existing facilities at Andrews, Davison and Beltsville.

OTHER CONCERNS

1. Representatives of hotels, visitors and trade associations fear that shorter hours and an early curfew may discourage travelers from flying into the Washington area the night before a meeting, or may cause them to leave the area earlier in the day -- thereby hurting hotel and restaurant business. Also, if a flight is scheduled into National, but is diverted to Dulles or BWI because of the curfew, it may cause great inconvenience to travelers or those meeting them, and thereby produce a confusing and negative impression of air travel to this area.

Response: The Task Force is unpersuaded that an earlier closing of National, at 10:30 p.m., will substantially impair Washington's hotel and restaurant business. As service is increased at Dulles and BWI, travelers will use these other airports, which are only 20 minutes farther away at that hour. We encourage, however, the FAA to allow those flights to land which depart in time to arrive at National before the curfew but which are delayed in flight. Under the new rules, this should happen infrequently and should cause no significant noise problem.

2. Some local and federal planning officials have suggested elimination of air service in the Northeast corridor, saying that it makes little sense to subsidize high speed train travel while encouraging air service over the same route.

Response: The competition of the marketplace -- autos, planes, buses, trains -- should be allowed to deal with this issue, as it does at present.

3. Local and Federal planners and park representatives have lamented the effects of airport noise and pollution upon the monuments and park areas, and claim that outdoor activities are unduly limited and made less pleasant.

Response: The proposed initial reduction in total jet flights may not make a significant difference in the perceived noise level on the Mall -- but it will prevent it from becoming worse. As noted elsewhere, we do recommend that the FAA consider exchanging extra airline slots during the week for sharply reduced airline activity on the weekends when outdoor activity is at its peak.

COMMENTS ON PROPOSED RULES

1. Total Annual Passenger Limit

Roughly 15.5 million passengers are projected to use National this year. The FAA proposes to establish a new maximum limit of 18 million per year.

A number of persons in areas affected by aircraft noise have said they wish that it were possible to close the Airport down or to at least significantly reduce the number of jet flights. If National were to be closed down, however, then approximately 18 million air travelers would have to be accommodated elsewhere -- most likely at Dulles and BWI. By 1985, these airports are already projected to handle more than three times their current passenger loads. To add all of National's passenger demand would cause severe overcrowding at both Dulles and BWI, and the access roads leading to them, with no room to accommodate future demand. This would seriously hamper efficient air transportation throughout the region. Other possibilities would be to build a major new airport somewhere in the region, or to use some existing facility such as Andrews Air Force Base. But these are not believed to be politically viable options.

Some citizen groups and local government agencies have proposed that the limit be cut back to a level of between 14 and 15 million per year. This appears to be unnecessarily disruptive. The proposed policy will not go into effect until 1981 when roughly 16 million will be using the facility. We believe the better course is to accommodate existing traffic and to allow for a smooth adjustment of airline scheduling and travel patterns, but not to the maximum theoretical limit provided by technological capacity or demand. The Task Force therefore believes the new limit should be somewhere between 16 and 18 million per year.

A question has been raised as to whether the number of passengers using National to connect to other flights should be included within the total annual limit. Presently, about 25% of commercial airline passengers and 75% of commuter airline passengers are estimated to be connecting to other flights. The airlines have suggested that since these connecting passengers do not contribute to the demand on parking spaces and access roads, they should be excluded from the total ceiling. On the other hand, it has been noted that by not including these passengers the total effective annual limit at National would be closer to 23 million than 18 million and this is not considered supportive of the broader objective of diverting demand to either Dulles or BWI.

2. Curfew

The Task Force found the curfew generally supported by local groups and opposed by most of the user representatives. General aviation representatives, for example, say that many of their aircraft are less noisy than larger commercial carriers and that, because they tend to be used by people for whom time saving is very important, general aviation should be allowed to use National Airport without regard to the curfew. The Task Force found, however, that general aviation aircraft will be permitted to use National until 10:30 p.m. (one hour beyond the 9:30 cut-off for scheduled commercial flights), and after that time the extra 20 minutes required to get to Dulles or BWI did not seem to represent a major inconvenience.

All user representatives have argued that any curfew at National would represent a harmful and undesirable precedent that might be adopted by other cities. The Task Force, as noted earlier, accepts the mandatory closing in this unique case, though it would prefer a voluntary system. The proposed FAA policy for National should not be regarded as a precedent elsewhere. Most other cities do not have two other major alternative airports serving the same market, and would be unlikely to cut off all service at an hour that would cause themselves serious economic harm.

3. Allocation of Slots

There is general support for the proposed transfer of existing slots from both major commercial carriers and from general aviation to the commuter airlines (i.e., those with less than 56 seats) in order both to serve smaller cities in danger of losing some air service under deregulation and also to reinforce the general orientation of National as primarily a short haul airport.

In addition, there is strong local support for the principle of further reducing air traffic using National on the weekends because: a) more people are outdoors in areas impacted by noise; b) there is less justification for flights into National in order to conduct business with, or on behalf of, the Federal government; and c) travelers could be easily accommodated at Dulles and BWI. The commercial airline industry has expressed some willingness to consider giving up some of its current weekend slots in exchange for additional slots during peak travel hours Monday through Friday, with those additional slots to be taken from general aviation. The Task Force felt, however, that the airline industry proposal did not go far enough towards reducing aircraft noise on the weekends and that consideration ought to be given by FAA to some additional reduction in weekend Airport operations.

4. Wide-bodied Aircraft

There is general support for the concept of allowing wide-bodied aircraft into National -- assuming they are able to operate safely there -- because they are able to carry more people on fewer flights and,

together with new technology, would therefore result in less total noise. To realize the maximum benefits of this policy, some runway upgrading and improved terminal facilities to permit adequate parking and loading areas would be needed. Also, a better roadway system and connection to the Metro will be required so that larger numbers of people going through the facilities at any one given time can be properly accommodated.

5. Perimeter Rule

The Task Force found that imposition of a maximum annual passenger limit and limitation on the type of aircraft that can use National (e.g. no four engine aircraft) essentially reduced much of the rationale for a perimeter rule. There is no necessary relationship between a perimeter rule and a reduction in aircraft noise -- given other standards related to aircraft technology and noise abatement. It has been pointed out, however, that present demands often exceed available slots. Extending the perimeter may only further exacerbate the slot allocation process and perhaps shift some long distance flights from Dulles and BWI to National. If a perimeter is to be continued, therefore, the Task Force believes that retaining the 650 mile limit, with its exemptions, is probably the most desirable. On the other hand, a limit of 1,000 miles as suggested in the proposed rules would also be acceptable.

It is a basic premise of the Task Force that National should be used for short haul flights as much as possible. Therefore, the Committee felt that if a perimeter limit is maintained, and no matter which limit is chosen, FAA should consider requiring that preference be given to the shorter of any two flights competing for the same time slot.

FUTURE ISSUES

1. Role of the Federal Government

In the present rulemaking procedures, the Department of Transportation is attempting to develop a coherent policy for its facilities at National and Dulles Airports. In addition, the Federal government needs to review its use of other Federal airport facilities in the region -- such as Beltsville (which is controlled by the Department of Agriculture), Andrews Air Force Base and Davison Air Field (which are controlled by the Department of Defense). Serious consideration should be given to shared use with general aviation of these underused facilities.

Continuing attention must be paid to the future responsiveness of Federal airport policy in the Washington region to local community interests. Although there will be a formal review of any Master Plan for the physical development of National and Dulles, there should also be a periodic review of the effects of whatever operating policy is adopted. Such a review should involve not only the airlines and other private sector interest groups and local governments, but also the states of Maryland and Virginia, which have their own overall regional aviation plans.

2. Physical Plans

Extensive modernization and substantial improvements are necessary to accommodate both operating and aesthetic interests in this airport serving the Nation's Capital. Such improvements should also encourage participation by the airlines in terms of financing a high quality design of their terminal facilities.

Assuming adoption of a formal operating policy this summer, a Master Plan is to be contracted for in August and proposed for public review during Fiscal Year 1981. Earlier preliminary plans for physical improvements were estimated to cost about \$200 million.

Some needs and options to be considered in such a plan are: runway, taxiway and ramp capacity to accommodate wide-bodied aircraft; a new North Terminal; retention/expansion of the Main terminal; a dual level roadway passenger drop-off and pick-up system; a parking structure to consolidate many of the existing 7,000 surface spaces; and a direct pedestrian connection with Metro, which is currently serving nearly 20% of Airport passengers.

The congestion caused by the staging of construction necessary to permit continued operation at National will also probably temporarily encourage a greater use of Dulles and BWI -- which in turn should contribute to the proposed long term diversion of a greater proportion of flights to those other facilities.

3. Financing of Improvements

Under the current accounting system, National's "profits" carry Dulles' "losses". National produces a \$10 million annual surplus for the U.S. Treasury while Dulles' losses amount to approximately \$1.5 million annually. Also, it should be pointed out that user fees at both airports are among the lowest in the Country. (See Exhibits IX through XIII.)

The Airports receive no direct funding from the national public Airport Development Assistance Program, although an equivalent amount under the national formula is requested each year as part of the Department of Transportation appropriations. Actual income earned from landing and concession fees is not retained and spent by the FAA Washington Metropolitan Airport Office, but instead flows directly to the U.S. Treasury.

The Congress should consider granting the Airports greater financial independence in order to encourage greater accountability. A separate regional authority to issue revenue bonds would probably be unacceptable to Congress because of likely loss of Federal control. The best choice may be the establishment of one or more revolving funds managed by a Government corporation, with some opportunity for direct Federal funding where appropriate. The St. Lawrence Seaway project might well be an applicable model.

The user fee structure for National should support the proposed policy goals -- i.e., encourage diversion of future traffic to Dulles and BWI, as well as provide for amortization of the physical improvements -- on the grounds that a premium facility offering premium convenience should command a premium price.

CONCLUSIONS AND
RECOMMENDATIONS

GENERAL CONCLUSIONS

1. FAA has done a good job in providing a framework for improving the quality of service at National. The proposed policies do not completely satisfy everyone concerned, but they reasonably accommodate most of the basic interests of both local citizens' groups and users. In conjunction with the already established Federal noise standards and new aircraft technology, the proposed annual passenger limit, fewer jet flights and reduced operating hours should produce significantly less noise in the surrounding area. At the same time, they would allow continued use of the Airport by local residents and by persons from elsewhere in the Country wishing to visit their Nation's Capital.
2. The basic operating and development framework for National Airport should be one of restricting future growth and encouraging diversion of additional demand to other airports in the region. Increasingly, there should be a tilt towards service to and from nearby cities. That is, National should continue to serve primarily short haul flights, on the theory that the connection on the ground should not take longer than the time in the air and that persons traveling long distances ought to be prepared for a relatively more time consuming ground connection.
3. Within this overall framework, FAA should maintain some flexibility to accommodate changed circumstances. The airline industry is presently undergoing a period of change and adjustment reflecting: Federal deregulation; increased fuel costs; new aircraft and navigational technology; improvements to competing transportation modes; and national and regional population movements. Any, or all, of these factors may cause the air carriers to shift their patterns of service during the next few years. Specific decisions about what type of aircraft should serve which cities and use which airports should be determined by the competitive marketplace to the extent possible.
4. Improvements in the physical condition of the terminal and ground transportation facilities at National should be made as quickly as possible. These improvements should be based upon, and supportive of, the proposed new policy of reduced jet operations and restricted future growth.
5. The costs of such physical improvements should be recovered over time by fees charged to users of the facilities, and the administration of the entire Airport operation should be as cost effective as possible.

RECOMMENDATIONS

The Task Force is in basic agreement with most of the FAA policy proposals, but wishes to offer some additional ideas intended to contribute further to a reasonable accommodation between those calling for more service to meet consumer demand and those who think National represents too much of an intrusion on the local community.

With Respect to Pending FAA Policy Proposals

1. Passenger Limit

Establish a limit of between 16 and 18 million total passengers a year. Recent growth rates would tend to produce approximately 25 million passengers a year at National by 1990. On the other hand, some public agencies and local citizens' groups have suggested reducing the number of passengers from existing levels. A passenger ceiling anywhere within the proposed range is a compromise that would allow a slight increase in passengers, but with a reduction in the number of daily jet flights. Also, it would result ultimately in about 50% of all projected regional air traffic being diverted in an orderly fashion to the presently underused facilities at Dulles and Baltimore/Washington International.

A complete closing of National, as has been suggested by some, would require the construction of a new airport or the substitution of another facility such as Andrews Air Force Base -- both highly unlikely prospects. Otherwise, an intolerable overload would result at Dulles and BWI -- both of which, it is forecast, will at least triple their current volume by 1990. Such an overload would create capacity and circulation problems both at the airports and on the access roads throughout the region, and would allow no room to accommodate future growth.

2. Curfew

Implement the proposed reduction in operating hours to prohibit scheduled flights of commercial airlines between 9:30 p.m. and 7:00 a.m. Also implement the proposed ban on all traffic at National between 10:30 p.m. and 7:00 a.m., except for emergencies and incoming flights that could reasonably have been expected to land within the deadline but were delayed due to weather or other uncontrollable circumstances.

The imposition of such a formal closing time should not be regarded as a general endorsement of such an action at other airports in other cities. Rather, it is only the unique nature of the Washington area, with one in-town airport plus at least two outlying facilities, that makes this restriction feasible.

3. Slot Allocation

a. Reduce the total number of major air carrier slots by an initial 10% as proposed, with subsequent further reductions as necessary to meet the new annual passenger ceiling. In addition, the FAA should consider varying the average daily allocation within the same weekly total so that fewer flights are scheduled on weekends when there is increased outdoor activity on the Mall and in residential areas, but more are allowed during peak demand periods during the week when passengers tend to be doing business with, or on behalf of, the Government.

b. Increase the number of slots available for commuter and air taxi service (i.e., aircraft with less than 56 seats), by transferring, as needed, an average of 4 per hour from major air carriers and 3 per hour from general aviation, thereby emphasizing the short haul nature of National and encouraging the diversion of more traffic to Dulles and BWI.

c. General aviation should continue to be allowed to operate at National beyond the proposed new limit of 9 slots per hour to the extent permitted by Airport facilities and the flight controllers' discretion during fair weather (i.e. under Visual Flight Rule conditions). Such conditions tend to prevail nearly 80% of the time, sometimes resulting in up to 30 general aviation flights per hour.

To further accommodate the needs of general aviation at National under Instrument Flight Rule conditions and to decrease unnecessary congestion, the Federal government should consider transferring its own aircraft (FAA, Coast Guard, etc.) to other Federally owned facilities such as Andrews or Dulles.

4. Wide-bodies

After assuring their ability to operate safely, permit the use of two and three engine wide-body aircraft in order to accommodate more passengers in fewer, quieter and more fuel efficient planes. Market-place pressures to use these aircraft, together with the proposed total annual passenger ceiling, should reduce the need for extra sections (e.g. the Eastern Shuttle) and should bring about significantly fewer total flights. Rigid quotas or substitution ratios of wide-bodied for narrow-bodied jets appear to be unnecessary.

5. Perimeter

Given a total annual passenger ceiling, restrictions on the type of aircraft permitted and an open competitive market under deregulation, a formal perimeter may not be required. If one is to be maintained, however, the Task Force feels the present 650 mile limit with the seven excepted cities is acceptable. On the other hand, other considerations

may persuade the FAA to establish an overall perimeter of 1,000 miles for non-stop service. In either case, National's short haul orientation should be maintained by an FAA rule giving preference to the shorter of any flights competing for the same slot.

With Respect to Other Issues

1. Noise Dispersal

To the extent practicable, consideration should be given to dispersing aircraft departures over more than one flight path, so that the noise is not concentrated over the same area all of the time.

2. Airport Redevelopment

Within the proposed annual passenger ceiling of no more than 18 million, a Master Plan should be developed for the modernization of the Airport that provides for: improved runway and terminal facilities to accommodate wide-bodied aircraft; a direct connection to Metro; replacement of surface parking with garages; a more efficient roadway system.

As part of this process, other related plans and proposals should be taken into account and pursued. These plans should include, for example:

- a. improved and upgraded concessions and taxi service at National;
- b. better access to Dulles by bus, Metro and/or possibly helicopter;
- c. the development of future additional facilities for general aviation at airports other than National — including shared use of other Federally owned airports in the region such as Beltsville, Andrews, and Davison, as well as Dulles;
- d. the relocation of Federal government aircraft and hangar space out of National, in order to better accommodate the physical as well as operational needs of other aircraft.

3. Airport Financing and Administration

Consideration should be given to the establishment of revolving funds sufficient to cover operating expenses and long term capital borrowing for both National and Dulles. Such funds should be financed by appropriate increases in user fees. They might be administered by

a Government corporation, perhaps modeled after the St. Lawrence Seaway Development Corporation, charged with following cost effective business management practices to the extent practicable.

Any additional costs for special facilities and services to accommodate the Federal government should be appropriated directly by Congress.

The fee structure for Airport users should also be designed to support and complement other aspects of the overall airport policy, such as diversion to Dulles and BWI of relatively longer, underused and primarily connecting trips.

 EXHIBITS

EXHIBIT I

 NATIONAL AIRPORT TASK FORCE
 Phillips S. Peter, Chairman

Earl P. Bassett, Jr.
 Vice President, Federal
 Government Affairs
 TM Company

K K Bigelow
 Corporate Director, Washington
 Relations
 Martin Marietta Corporation

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 Calvin Cafritz Enterprises

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 & Smith Inc.

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 Peoples Drug Stores, Inc.

Norman Farquhar
 General Partner
 Alex. Brown & Sons

Donald S. Farver
 President
 Blue Cross

James D. Franklin
 H.G. Smithy Company

Theodore R. Hagans, Jr.
 Chairman
 Hagans Enterprises

George W. Hoyt
 Publisher
 The Washington Star

Daniel L. Hurson
 Chairman of the Board & Chief
 Executive Officer
 Acacia Mutual Life Insurance
 Company

Paul R. Ignatius
 President & Chief Executive
 Officer
 Air Transport Association of
 America

Charles F. Jones
 President
 NUS Corporation

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 Chairman of the Board &
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 Security National Bank

William J. McManus
 Byers & McManus Associates

William E. Miller
 Partner
 Steptoe & Johnson

Blake T. Newton, Jr.
 President
 American Council of Life
 Insurance

NATIONAL AIRPORT TASK FORCE -- Page Two

Melvin M. Payne
Chairman of the Board
National Geographic Society

Phillips S. Peter
Vice President
General Electric Company

Martin Rubenstein
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Mutual Broadcasting System, Inc.

John F. Ryan
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Washington
International Telephone &
Telegraph Corporation

Victoria Schuck
President
Mount Vernon College

Richard A. Schuman
Group Vice President - Peoples
Division
Peoples Drug Stores, Inc.

Raymond P. Shafer
Partner & Senior Counselor
Coopers & Lybrand

*Foster Shannon
President
Shannon & Luchs Company

Donald K. Smith
Senior Vice President & General
Counsel
Government Employees Insurance
Company

Douglas R. Smith
Chairman of the Board
National Savings & Trust Company

Robert H. Smith
President
Charles E. Smith Building
Corporation

William L. Smith
General Manager
The Washington Hilton

**John W. Snow
Vice President
Chessie System

***John W. Stadtler
Chairman and Chief Executive
Officer
National Permanent Federal Savings
& Loan Association

Roger L. Stevens
Chairman
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Henry Strong
President
Hattie M. Strong Foundation

David R. Waters
Chairman of the Board & Chief
Executive Officer
Garfinckel, Brooks Brothers,
Miller & Rhoads, Inc.

*Chairman, Physical Development Committee
**Chairman, Operations Policy Committee
***Chairman, Financing Committee

NATIONAL AIRPORT
OPERATIONS

EXHIBIT II

	Existing Conditions	FAA Proposed Policy 1990
Aircarrier		
Wide-body per Day	0	154
Total Aircarrier per Day	626	480
Total Aircarrier per year	208,000	175,000
Commuter		
Total Operations per Day	145	200
Total Operations per Year	48,000	73,000
General Aviation		
Total Operations per Day	260	258
Total Operations per Year	95,000	98,000
Totals		
Total Operations per Day	962	948
Total Operations per Year	351,000	346,000

PASSENGER DISTRIBUTION

1979 Existing	
DCA (National)	15,009,000
IAD (Dulles)	3,519,000
BWI	3,818,000
Regional Total	22,346,000
1990 Proposed Policy	
DCA	18,000,000
IAD	10,151,000
BWI	9,420,000
Regional Total	37,571,000*
1990 Restricted Policy	
DCA	16,000,000
IAD	11,354,000
BWI	10,222,000
Regional Total	37,576,000*
1990 Expanded Policy	
DCA	22,090,000
IAD	7,694,000
BWI	7,782,000
Regional Total	36,566,000*

*Projections do not include estimates of general aviation at Dulles or BWI.

EXHIBIT III

AIRCRAFT ACTIVITY AND PASSENGER LOAD AT NATIONAL

CALENDAR YEAR 1972

CATEGORY	TOTAL PASSENGERS	PERCENT	TOTAL OPERATIONS	PERCENT	PASSENGERS PER OPERATION*
Air Carrier	10,689,961	96.1%	218,984	66.1%	48.8
Commuter	250,002	2.3%	30,746	9.3%	8.1
Gen. Aviation	182,002	1.6%	81,699	24.6%	2.3
Total	11,121,965	100%	331,429	100%	

CALENDAR YEAR 1979

CATEGORY	TOTAL PASSENGERS	PERCENT	TOTAL OPERATIONS	PERCENT	PASSENGERS PER OPERATION*
Air Carrier	14,277,825	94.3%	207,112	58.7%	60.9
Commuter	632,567	4.2%	48,594	13.8%	13.0
Gen. Aviation	223,614	1.5%	97,198	27.5%	2.3
Total	15,134,006	100%	352,904	100%	

* In the case of general aviation, crews are included in the passenger count; in the case of air carriers and commuters they are not.

AIRPORTS TRAFFIC ACTIVITY

AIRPORT	CY 1978 Aircraft Operations			Passengers (Millions)	Ranking by	
	Total (000)	General Aviation			Total Operations	Total Passengers
	B/	Operations (000)	% Total Operations		C/	D/
Washington National	352	94	27	14.2	26	11
Dulles	177	109	61	3.2	144	36
Baltimore	222	99	45	3.6	86	32
Logan	346	54	16	13.5	28	12
La Guardia	367	70	20	17.3	21	9
JFK *	344	32	9	25.1	31	4
Newark *	210	34	16	6.6	104	19
Tampa	223	72	33	7.0	90	22
San Francisco	357	57	16	23.0	24	5
Oakland *	471	400	85	2.8	10	42
San Diego	204	97	48	6.2	102	24

B/ Source: Tower Airport Statistics Handbook for CY 1978. Compiled by Advanced Technology, Inc., April 1979, for FAA.

C/ Source: Airport Operators Council International (AOC) Passenger Survey, April 1979.

D/ Source: FAA Air Traffic Activity for CY 1978.

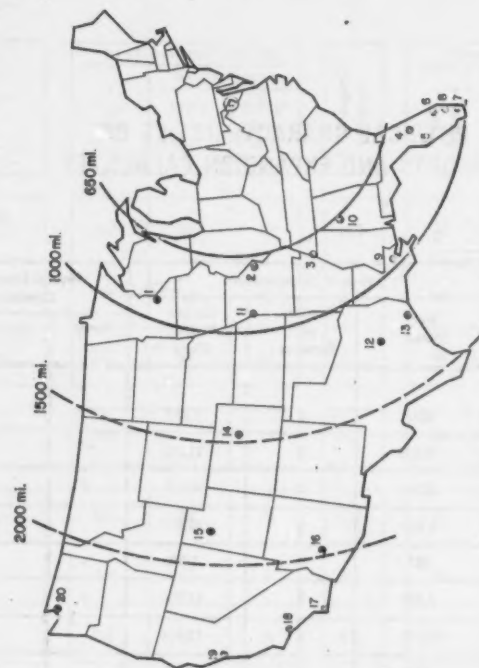
* Airports Not Visited by Study Team

EXHIBIT V

PHYSICAL CHARACTERISTICS OF
AIRPORTS AND EXPANSION CAPABILITY

AIRPORT	Physical Characteristics			Physical Expansion Capability		
	Size (Acres)	Number of Runways	Longest Runway (Feet)	Good	Fair	Poor
Washington National	860	3	8,370			✓
Dulles	10,000	3	11,000	✓		
Baltimore	3,230	4	9,520	✓		
Lagan	2,400	5	10,800			✓
La Guardia	850	3	7,000			✓
Tampa	3,300	3	11,000	✓		
San Francisco	5,210	4	12,600			✓
San Diego	480	2	9,480			✓

EXHIBIT VI

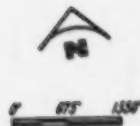
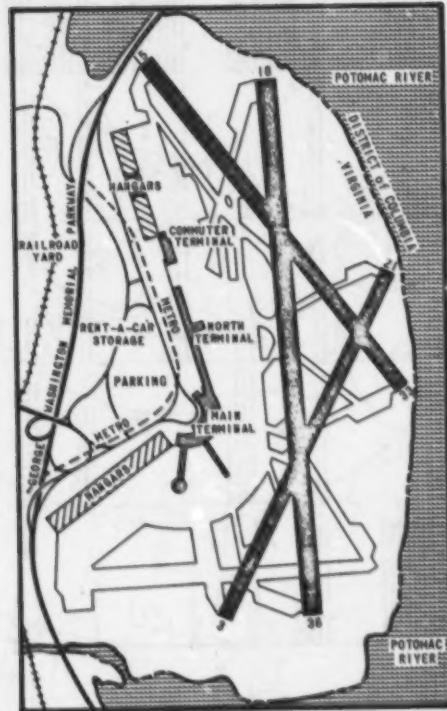


- Grandfather Cities:
1. Minneapolis/St. Paul
 2. St. Louis
 3. Memphis
 4. Dallas
 5. New York
 6. West Palm Beach
 7. Miami
- Additional Cities Eligible for Non-Soy Scrubber with Grandfather Perimeter:
8. Los Angeles
 9. New Orleans
 10. Birmingham
 11. Kansas City
 12. Chicago
 13. Houston
 14. Denver
 15. Salt Lake City
 16. Phoenix
 17. San Diego
 18. San Francisco
 19. Seattle
 20. Portland

METROPOLITAN WASHINGTON AIRPORTS
ENVIRONMENTAL IMPACT STATEMENT SUPPLEMENT
CITIES AFFECTED UNDER VARIOUS
PERIMETER OPTIONS AT NATIONAL

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EXHIBIT VIII



METROPOLITAN WASHINGTON AIRPORTS
ENVIRONMENTAL IMPACT STATEMENT SUPPLEMENT

EXISTING FACILITIES
NATIONAL AIRPORT

EXHIBIT IX

METROPOLITAN WASHINGTON AIRPORTS

Performance Information:

	FY 1979 Actual	FY 1980 Estimate	FY 1981 Estimate
<u>Washington National Airport:</u>			
Passengers (thousands)	15,009	15,970	16,170
Air Operations (thousands)	351	360	360
Air Cargo (million pounds)	176	181	187
Freight	(81)	(84)	(88)
Mail	(95)	(97)	(99)
<u>Dulles International Airport:</u>			
Passengers (thousands)	3,519	3,713	4,123
Domestic	(2,904)	(2,989)	(3,319)
International	(615)	(724)	(804)
Air Operations (thousands)	175	221	227
Air Cargo (million pounds)	125	144	153
Freight	(76)	(91)	(96)
Mail	(49)	(53)	(57)

Fiscal Year 1981 Budget Request:

	1980 Appropriation		1981 Estimate	
	Pos.	Amount	Pos.	Amount
<u>Washington National Airport</u>				
Operating Requirements	419	\$12,558,000	419	\$13,959,000
Capital Requirements	-	617,000	-	1,153,000
Total	419	13,175,000	419	15,112,000
<u>Dulles International Airport</u>				
Operating Requirements	407	12,469,000	407	13,131,000
Capital Requirements	-	659,000	0	342,000
Total	407	13,128,000	407	13,473,000
Total O&M	826	26,303,000	826	28,585,000

EXHIBIT X

OPERATING & NET PROFIT OR LOSS
METROPOLITAN WASHINGTON AIRPORTS
FY 1963 - FY 1977
(in 000's)

Washington National Airport	Revenues	Operating Expense	Operating Profit or (Loss)	Interest & Depreciation	Net Profit or (Loss)
FY 1963	\$ 4,323	\$ 3,050	\$ 1,273	\$ 888	\$ 385
FY 1964	4,874	3,328	1,546	933	613
FY 1965	5,263	3,258	2,005	1,190	815
FY 1966	5,699	3,377	2,322	1,325	997
FY 1977	7,281	3,537	3,744	1,160	2,584
FY 1968	8,416	3,621	4,795	1,439	3,356
FY 1969	8,137	4,017	4,120	1,844	2,276
FY 1970	9,449	4,493	4,956	1,398	3,558
FY 1971	10,041	4,906	5,135	1,426	3,709
FY 1972	11,017	5,048	5,969	1,806	4,163
FY 1973	11,926	5,039	6,887	1,657	5,230
FY 1974	13,460	6,420	7,040	1,725	5,315
FY 1975	14,820	8,335	6,485	2,350	4,135
FY 1976 (15 Months)	21,266	11,335	9,931	2,572	7,359
FY 1977	18,232	10,246	7,986	2,213	5,773
FY 1978	20,962	10,973	9,989	2,025	7,964
FY 1979	23,807	11,613	12,194	2,030	10,164
FY 1980 (est.)	25,335	13,150	12,185	1,959	10,226
FY 1981 (est.)	26,749	14,556	12,193	1,859	10,304

OPERATING & NET PROFIT OR LOSS
METROPOLITAN WASHINGTON AIRPORTS
FY 1963 - FY 1977
(in 000's)

	Revenues	Operating Expense	Operating Profit or (Loss)	Interest & Depreciation	Net Profit or (Loss)
<u>Dulles International Airport</u>					
FY 1963	\$ 1,090	\$ 2,713	\$(1,623)	\$ 5,338	\$(6,961)
FY 1964	2,363	3,741	(1,378)	5,338	(6,716)
FY 1965	2,415	3,984	(1,569)	5,795	(7,364)
FY 1966	2,585	4,209	(1,624)	5,740	(7,364)
FY 1967	3,035	4,137	(1,101)	6,145	(7,246)
FY 1968	3,536	4,362	(826)	6,134	(6,960)
FY 1969	3,638	4,701	(1,063)	5,250	(6,313)
FY 1970	4,277	5,156	(849)	4,871	(5,720)
FY 1971	5,147	5,618	(471)	4,990	(5,461)
FY 1972	5,517	5,932	(415)	5,715	(6,130)
FY 1973	6,418	5,837	581	5,448	(4,867)
FY 1974	6,953	7,186	(233)	5,856	(6,089)
FY 1975	7,186	8,529	(1,343)	5,756	(7,099)
FY 1976 (15 Months)	13,694	11,100	2,594	7,886	(5,292)
FY 1977	11,957	10,663	1,294	5,467	(4,173)
FY 1978	13,716	11,169	2,547	5,264	(2,717)
FY 1979	14,955	11,858	3,097	4,861	(1,764)
FY 1980 (est.)	16,351	13,145	3,206	4,816	(1,610)
FY 1981 (est.)	17,143	13,826	3,317	4,786	(1,469)

EXHIBIT XII

AIRPORTS FUNDING PROFILE

AIRPORT	Funding Source					Capital Improvement			Order	Subsidize Other	Transport Activities	Cost Recovery, Debt Service	ADAP Funds Rec'd (million \$)
	Operating Budget		Revenue	Bond Issues	Surplus/Contingency Fund	Appropriation							
	Appropriation												
Washington National	X					X					X		4
Dallas	X					X					X		4
Baltimore	X					X					X		15.6
San Francisco	X				X			X			X		26.6
Logan		X	X	X	X			X			X		22.6
La Guardia		X	X	X	X			X			X		19.2
Tampa		X	X	X	X			X			X		13.1
San Diego		X	X	X	X			X			X		13.3

Source: FAA Document Titled "Total ADAP Funding for 77 Airports" Enclosed @ 25% of Grand Total
 Enclosed as of 8/20/79
 All funds deposited in the Washington National Airport, U.S. Treasury
 All funds deposited in the ADAP Fund Account That Should be Reported as ADAP Appropriations Federal Airport
 All funds deposited in the Washington National Airport Capital Improvement Budget as a Source Mark
 Funds Derived From a Transportation Trust Fund Derived From all Transportation Revenues, Gas Taxes, Etc
 All Income Deposited in the San Francisco General Fund
 Not Using Authority

EXHIBIT XIII

AIRPORT LANDING FEES &
TERMINAL SPACE RENTAL COSTS

(Source: Airports Operators Council International, 4/79 Report)

AIRPORT	Landing Fees			Terminal Space Rental Range
	Category (Tenant) Cost Per 1000 Lbs.	General Aviation Cost Per 1000 Lbs.	Minimum Fee	Cost Per Square Foot
Washington National	\$0.33	\$0.12 Prop. \$0.30 Jet	\$4.00	\$0.15*
Dulles	0.34	0.25	0.75	12.95*
Baltimore	0.45	0.64 <u>A/</u>	3.50	9.96*
Logan	1.20	1.20	5.00	11.94-29.03
La Guardia	1.77	1.50	10.00 <u>A/</u> 25.00 <u>A/</u>	4.80-5.80
JFK **	0.55	0.55	10.00 <u>A/</u> 25.00 <u>A/</u>	3.50-35.00
Newark **	1.77	1.50	10.00 <u>A/</u> 25.00 <u>A/</u>	6.00*
Tampa	0.36	None	None	9.84-24.81
San Francisco	0.23 <u>A/</u>	0.23 <u>A/</u>	None	5.00-24.75
Oakland **	0.50	0.50 <u>A/</u>	6.25	13.32-19.02
San Diego	0.44	None <u>A/</u>	None	11.77*

A/ If Operating Under an Agreement With the Airport Management, Landing Fee is \$0.45 Per 1,000 Lbs.

Single Engine Plane Charge is First \$3.50

A/ Minimum Charge For Each Takeoff is \$10.00A/ Applies to General Aviation Aircraft With Seating of Less Than 25 and Landing M.F. 9:10 AM and Every Day 3-6 PMA/ Discounts Applied After First 40 Million Lbs.A/ When Maximum Gross Landing Weight is Over 12,500 Lbs. Otherwise \$6.25 Minimum AppliesA/ Tie Down and Storage Fees Are Paid to Fixed Base Operators (FBO) Who in Turn Pay Rent for Airport Property

* All Areas

** Airports Not Visited by Study Team

TESTIMONY OF STANLEY FRANK
CHAIRMAN OF THE GREENSBORO/HIGH POINT AIRPORT AUTHORITY
BEFORE THE AVIATION SUBCOMMITTEE OF THE COMMITTEE
ON PUBLIC WORKS AND TRANSPORTATION

My name is Stanley Frank. I am Chairman of the Greensboro/High Point Airport Authority. I appreciate the fact that this Committee has instituted hearings on the FAA Policy at Washington National and has given us this opportunity to present our views. The fact that you are holding hearings here today emphasizes the importance of a sound policy for Washington National.

Certainly, it is important for the Greensboro/High Point/Winston-Salem area. Its single most important requirement for good air service is good service to Washington National. This service is used by over 120,000 passengers a year, or about 330 passengers a day. About half of our passengers connect at Washington National for service to other cities.

Because of the importance of this service, we oppose any policy which produces any reduction in our service to Washington National Airport. If the FAA reduces slots at Washington National, it should simultaneously promote the transfer of long-haul flights to other area airports. In its final rule, the FAA should also guarantee sufficient slots to assure at least the present service level in all short haul markets including service to the Greensboro/High Point/Winston-Salem Regional Airport.

Washington National is the only convenient airport for our Washington passengers. A study by the Washington Council of Governments shows that during the morning and afternoon period, which would be used by our passengers, the roundtrip surface time at Dulles is 2 hours and 9 minutes -- about two and one-half times the 50 minutes' air time.

Baltimore-Washington International Airport is even more inconvenient for these passengers.

Good air service for the Greensboro/High Point/Winston-Salem area also requires that our passengers have access to the Nation's air transportation system through the connecting service that only Washington National can provide. Dulles Airport has virtually no connecting service; Baltimore-Washington International Airport has only about one-third the connections of Washington National.

What is needed is a special provision to assure that Washington National fulfills its primary role of providing service to nearby cities. This provision would set aside the same number of slots for cities within 300 miles of Washington as are being used to provide that service today. This would maintain Washington National's role as the short haul airport. It would preserve the quality of service not only for Greensboro/High Point/Winston-Salem, but for other cities in the States of Virginia, West Virginia and North Carolina which are similarly dependent on Washington National.

A similar provision is also necessary if the FAA should adopt a proposal to use an auction to allocate slots between air carriers. The auction method is loaded in favor of the long haul flights carrying big ticket passengers. For example, coach passengers flying to Chicago on United pay \$119. This is almost twice the \$66 paid by a Greensboro-Washington passenger on an Eastern flight. This means that at about the same percentage of passenger revenue, United can bid almost twice as much for a Washington National slot for its Chicago service as Eastern could bid for Greensboro service.

The auction method would encourage long haul service at Washington National and would force short haul service to use Dulles or BWI. This is inverted policy. The only way that we can be assured that short haul services will be continued at Washington National under an auction system is to set aside the existing short haul slots for this service and to hold a separate auction for these slots.

The FAA is moving in a direction which will destroy the quality of short haul service at Washington National. We believe that special provisions for short haul service such as the ones I have outlined, are necessary to maintain the quality of service to cities like Greensboro/High Point/Winston-Salem, and to preserve Washington National as the short haul airport.

Norma Danis Spiegel, Chairman
Set Noise Committee

5305 Wapakoneta Rd.
Bethesda, Md. 20016
June 19, 1980

GLEN ECHO HEIGHTS CITIZENS ASSOCIATION

GLEN ECHO HEIGHTS, MARYLAND

HEARING BEFORE THE SUBCOMMITTEE ON AVIATION CONCERNING THE DEPARTMENT
OF TRANSPORTATION'S PROPOSED POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

We are happy to have this opportunity to make comments before this subcommittee on the subject of our local airports. If there is one totally noncontroversial issue within our community, it is our stand on this as we shall present it to you. It is our belief that you, Congress, will have the ultimate say with respect to the question of whether or not the serious overuse of Washington National Airport will continue and grow worse, or abate. We trust that once you have been informed of the environmental damage and the black eye this airport gives our nation's capital, you will wisely alter the course of the plan proposing to intensify its use.

We hope you have noticed that the testimony you have heard from the "folks up the river" or "down the river" is not confined just to complaints about the overflight abuse in the valley, its parks, and residential areas, but rather that this testimony includes a very refined understanding of the total troubled National airport scene. FAA's analysis of the 1978 hearing record seems to have pigeon-holed all testimony into two categories, that of local residents opposed to the overflights, and that of the airlines purporting to be serving the national interests. However, there was a good body of testimony from responsible, qualified persons and agencies for example COG, NCPC, and DOI, among others, which should not be passed over. It must be more than coincidental that their conclusions and ours agree.

Except for the curfew we totally reject the Proposed Changes, and maintain that the EIS, due to its shortcomings, does not support the FAA case for the changes. In fact the EIS as a court ordered document is a woeful disappointment. Rather than list the points in the Proposed Changes with which we take issue, we shall state here our unequivocal support for the testimony given by our umbrella organization, the COALITION FOR AIRPORT PROBLEMS. From our point of view the case could not be better stated than in the CAP document. Instead we prefer to comment on a few basic points which should have been investigated when one deals with an airport, any airport, but with WNA in particular. These questions we will first ask, then answer each in turn.

The first consideration is location.

- * Is it compatible with its environment?
- * Does location reflect precepts of good urban planning?
- * Has local government had a voice in selecting its location?
- * Do the citizens want it here?
- * Does the airport adhere to federal standards?
- * Is this location the only alternative?

and finally there are the considerations of safety and access.

Taking then COMPATIBILITY of location: as one of the busiest airports in the world, there is considerable impact on the national monuments, parks and communities under the flightpaths.

In respect to URBAN PLANNING: the National Capital Planning Commission has taken a position to close the airport. Its location astounds cultivated foreign travellers. They cannot understand why it is allowed to

continue when all other nations have already banned such an inner city operation.

What is the OPINION OF LOCAL JURISDICTIONS: The Council of Governments has strongly advocated the same 50% cutback in operations as requested by the communities. Local congressmen and county officials have been equally outspoken in this position.

What do the CITIZENS WANT: in 1967 over 10,000 signatures demanded redress from the FAA, and now the situation is even worse. Point of universal agreement is the demand now from communities for a 50% cutback in daily operations. Despite requests from the public in hearing after hearing for more flights from Dulles nad BWI, traffic at Dulles has declined 12% since 1969.

Are there ALTERNATIVE LOCATIONS: Both Dulles and BWI are not further than other airports for major cities in the U. S. or other capitals around the world. Convenience is not the first consideration when locating an airport or any other public facility which has potential for damaging the public health and welfare. Safety and impact are the prime considerations, then convenience is provided by good access and transit systems.

Does the AIRPORT ADHERE TO THE FEDERAL STANDARDS: you must be aware that National violates FAA's own policy on close-in airports, and it is also operated with disregard to the standards which FAA imposes on every other airport in the nation. WNA violates EPA standards for noise and pollution. Furthermore the new policy would add 33% more pollution from air and surface traffic.

Is the AIRPORT SAFE: as one of the busiest in the world, it is presently overused on a daily average of 125%. At times during clear weather there are over 80 operations/hour. Near misses are no longer logged, but passengers tell. There is no way to significantly increase the operational safety of National. You have already heard expert witnesses state the inadequate length of its only used runway. In 1968 FAA stated that the runways were not sufficiently strong to accommodate the airbusses. Related to safety is the health issue. In a 1979 study made at UCLA on airports medical testimony indicated a significant rise in cases of tumors and a 19% increase in the rate of death occurred in communities near the Los Angeles airport. A control group was used, and chances of this data being unsound were given as one in 1000.

ACCESS: a 1968 study by ABT Associates showed that the average time saved for users within the beltway was 5 to 10 minutes over traveling to Dulles. When one considers total travel time which is door to door, say for a two hour flight (46% of all flights are 500 to 1000 mile radius) total time could easily be $3\frac{1}{2}$ hours. The additional time to Dulles even at 15 to 20 minutes would be then only about 10% more.

The NEP contours are misleading in that they do not reflect the actual degree of sound endured in the river valley, and this was noted in our comments in 1978. Noise contours are calculated over what is assumed to be a flat surface. However, in the situation of the river valley, the surface approximates a trough in which the sound waves are trapped. NEP contours give then an inaccurate por-

trayal of the seriousness of the noise impact. Noise in the valley is many times longer lasting than when heard over a flat surface. Due to this factor noise here at the nine mile point is just as oppressive as it is closer to the airport where the land is flat.

Testimony presented by ALPA on June 11 concerning the dangers from W-B jet turbulence prompts us to withdraw our endorsement of the use of these craft at WNA. The "handwriting on the wall" now reads that the future of WNA should be that of a shorthaul airport only.

The EIS gives a very wrong impression concerning the amount of pollution generated by WNA and sustained by the metro area. Data are given for the airport and vicinity only, which tonnages, when averaged over the official 2399 square miles known as metropolitan Washington, shows in the EIS as a mere 1% increment. Tonnages are not given for pollution disbursed along the flightpaths. When this information becomes available please call to mind that the flightpath, indeed any flightpath, is only one 400th part of the metro area, and that this amount falls on the same population day after day, year after year.

Our final comment will treat the subject of changing airport administrators. Since these are the only two airports in the nation in the special category of federal ownership and operation, and it has been demonstrated over the years that the FAA has not exercised sound judgment in their administration, we believe that their control ought to be ceded to an independent agency such as a Port Authority. Such an authority, tied neither to the interest of the airlines nor to the businesses which seem to have a stake in the present location of WNA, could rise to the challenge of wise land-use management and reflect modern environmental standards which are practised in the other nations of the western world, even practised here in the States at other airports.

Again to restate this problem in the simplest possible terms: you are being asked to determine whether or not the position of an intensely used, to the point of aggravation and hazard, airport facility in the heart of a large, populous, very prestigious and otherwise beautiful city should be irrevocably entrenched. You must keep in mind that no matter how much the creature comforts of the 14 or 18 million passengers are catered to, the actual operational safety which is of critical importance, is impossible to significantly improve. Should decisions be made to the detriment of the environment for the benefit of saving in-town passengers one quarter hour of ground travel time? (which is likely to be less than 10% of the total door to door time for the average flight from WNA.) Time is quantitative and has a monetary value. The values we are seeking to preserve are priceless, timeless, and irreplaceable.



Greater Newark Chamber of Commerce

50 Park Place
Newark, New Jersey 07102
(201) 624-6888

June 3, 1980

The Honorable Glenn M. Anderson
Chairman/Sub-Committee on Aviation
Public Works & Transportation Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Senator Anderson:

It has come to our attention that the Federal Aviation Administration is proposing to substantially reduce air service at National Airport, by reducing the number of "slots" for scheduled carriers.

The elimination of flights after 9:30 p.m. and the forced decrease in the number of slots permitted during the day and evening hours would significantly hamper transportation between Washington, DC and the Newark, N.J. metropolitan area.

A large number of representatives from both private concerns and government agencies travel by air between Newark and Washington's airport daily. The increase in cost to these travelers, as well as the added inconvenience, will have a significant negative impact on commerce in the area. Business people who, for example, plan to travel back from Washington to Newark in the late afternoon and were delayed beyond the evening would no longer be able to take the 10 pm flight. They would as a result, incur either significantly greater cost or in the future, choose to eliminate the trip altogether.

I understand that noise created by aircraft both landing and taking off, is a major problem. It is a problem here in Newark, as well. However, many of the air carriers, through the use of new and consequently quieter aircraft and special noise abating landing and take-off procedures have averted much of the increase in travel noise. We expect that trend to continue here at Newark as well as at Washington's National Airport.

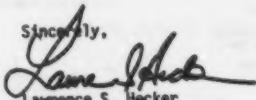
The FAA's proposed service reductions will provide significant and harmful deleterious impact on commercial activity between the Washington and Newark regions, as well as impinge on service to the public.

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The Greater Newark Chamber of Commerce urges you to take the action necessary to make certain that the FAA proposal would not take effect as stated and that service reductions as proposed, not be tolerated.

Thank you for your cooperation.

Sincerely,



Lawrence S. Hecker
Executive Vice President

LSH/mb

cc: Congressmen Rodino and Rinaldo
Senators Bradley and Williams



JOHN F. HERRITY
CHAIRMAN
4120 GRASS BRIDGE ROAD
FAIRFAX, VIRGINIA 22030
TELEPHONE 991-3351

COMMONWEALTH OF VIRGINIA
COUNTY OF FAIRFAX
BOARD OF SUPERVISORS
FAIRFAX, VIRGINIA 22030



June 11, 1980

Congressman Glenn M. Anderson
Chairman
House Public Works and Transportation
Subcommittee on Aviation
Room 2165, Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Anderson:

It was with pleasure that we availed ourselves of the opportunity to add our serious concerns to those who testified on the future of Washington National Airport during the hearings before your Subcommittee on Aviation.

Supervisor Duckworth from the Mount Vernon District in Fairfax County provided me with the attached statements in which she emphatically presents the views of her constituents regarding the intolerable noise levels to which they are frequently exposed. These views were not received in time to be appended to our Board's official position--although they are totally consistent with the recommendations that we presented to your Subcommittee last week.

If it is administratively possible for the enclosed statements to be considered together with our prepared testimony and entered into the record I will be most appreciative.

Sincerely,

John F. Herrity
Chairman

Enclosures

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FAIRFAX COUNTY, VIRGINIA

MEMORANDUM

TO: Hon. Jack Herrity
Chairman, Board of Supervisors DATE June 6, 1980

FROM: Sandra L. Duckworth
Supervisor, Mount Vernon District

FILE NO:

SUBJECT: Testimony on Airplane Noise before the House Subcommittee
on Aviation.

REFERENCE:

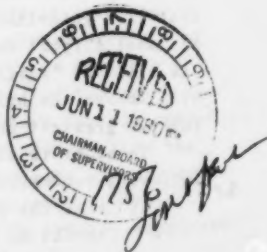
I understand that you will be speaking for the Fairfax County board of Supervisors at the June 11 hearing by the House of Representatives Subcommittee on Aviation concerning the Department of Transportation's proposed policy for Metropolitan Washington airports.

Attached are copies of my two previous statements on airplane noise. As the Mount Vernon District is directly affected by all south bound takeoffs, I would appreciate your consideration of the proposals herein.

I will look forward to discussing this matter with you at the Board meeting on June 9.

Enclosures

CC.: Supervisor Martha Pennino
Supervisor Nancy Falck





SANDRA L. DUCKWORTH
MOUNT VERNON DISTRICT
8101 MOUNT VERNON ROAD
SUITE 115
ALEXANDRIA, VIRGINIA 22304

TELEPHONE 780-7510

COMMONWEALTH OF VIRGINIA
COUNTY OF FAIRFAX
BOARD OF SUPERVISORS
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BOARD OF SUPERVISORS
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NANCY E. FAIRC
AUDREY C. MOORE
MARTHA V. PENNING
JAMES M. SCOTT
MARK TRAVIS

STATEMENT PREPARED BY SUPERVISOR DUCKWORTH
TO BE READ INTO THE RECORD BY HER REPRESENTATIVE,
MR. FRANK FINSTHWAIT

March 27, 1980

Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, D. C. 20001

Subject: Supplement to the Draft Environmental Impact
Statement (SDEIS)

Gentlemen:

The Mount Vernon District of Fairfax County, Virginia is located along the west bank of the Potomac River south of the Woodrow Wilson Bridge. It lies in the path of westbound aircraft which make their turn south of the bridge when the wind direction calls for a southerly take-off. This involves approximately 80% of the scheduled turbojet air carriers departing from National Airport. For this reason, the 68,600 residents of the Mount Vernon District are concerned that firm guidelines be established for the operation of National Airport which will reduce our exposure to the countless low altitude aircraft which fly over us each year, which will lessen the noise and which will provide operational safety for the greatest number of people.

In order to accomplish these objectives, we endorse the following recommendations:

1. that the proposed policy's curfew of operating hours should be set back from 10:30 p.m. to 9:00 p.m. and aircarrier scheduling as well as the reduction in aircarrier slots from the current 40 to 36 be considered a first step to be followed annually by further slot reductions, so as to reduce aircarrier operations per hour from its current 40 to 20 by 1985; that some slot reductions be undertaken in conjunction

March 27, 1980

with perimeter restrictions involving cancellation of the exemption for the "grandfather" cities and by the introduction of a 650 mile perimeter limiting flights to and from National Airport to points within that perimeter;

2. that the annual total passenger level be limited so as not to exceed 14 million after having been reduced below that level;
3. that "extra sections" of scheduled shuttle service be included in the total limit of carrier operations;
4. that a Regional Advisory Board be established to deal with aviation policy questions in the metropolitan area, so that the views of the residents may be properly represented in the decision making process.

We further recommend a continuing investigation in cooperation with the Metropolitan Council of Governments (COG) into departure flight patterns with a view to reducing exposure to low flying aircraft in areas such as ours which for years has been subjected to an inequitable and grossly unfair impact of aircraft noise.

In our opinion, neither the 1978 DEIS nor the SDEIS give reason to hope that the objectives of the Federal Aviation Authority (FAA), as expressed therein, will give us the relief we need nor even approach the objectives which we feel are reasonable and fair. When the public was invited two years ago to provide input for the formulation of a policy for the operation of the Metropolitan Washington Airports, the message from the residents and citizens' groups was loud and clear: "Activity at National Airport should be greatly restricted and more utilization made of the other area airports." This is supported by the tabulation in the 1980 DEIS (Table II - 2).

Less than 400 agencies, organizations and individuals opposed your suggested policy because it was "too restrictive." Only 16 were satisfied with it. Over 700 opposed your policy

March 27, 1980

because it was "not restrictive enough." This includes organizations such as Virginians for Dulles, a citizens' group which brought the law suit that resulted in the DEIS and policy formulation effort in the first place; it includes also the Metropolitan Council of Governments which represents citizens in the entire region.

Among those petitioning for continued growth at National were many who do not even live in the area and who have no reason to be concerned about the needs of our residents for a decent environment to live in. For example, the SDEIS lists 128 petitions from the city of Birmingham, Alabama including individuals and organizations opposed to the policy because it was "too restrictive."

In the absence of more convincing evidence than that contained in the SDEIS, we cannot accept as valid the presumably equal weight assigned to the following propositions:

1. Activity at National Airport should be greatly restricted and more utilization made of the other area airports.
2. The current level of activity at National Airport should be permitted to grow and its regional role expanded.

Likewise, we question the implication that your recommended policy of "controlled growth" at National Airport is a reasonable mean between these two extremes. Moreover, a delay of two years between the DEIS and SDEIS does not make any more convincing the impression implied in the supplement that the citizens' input is having any real impact on the policy making process.

National Airport has been growing under Federal Government operation to the point where the aircraft and passenger traffic volume, the vehicular congestion, the miserable parking accommodations and the noise, more than offset the touted "convenience" of this close-in facility. Your proposed policy is ambivalent. Although it would provide for closing of the National Airport at night and a 10% slot reduction for scheduled

March 27, 1980

air carriers, it is the bottom line which disturbs us. Any substantial noise relief during the daylight hours has been moved far into the future. Passenger volume at National Airport, 14 million in 1978, 15 million in 1979 is projected to be 18 million by 1990 and National is to remain the principal airport in the region with a greater volume than either Dulles or BWI and the unfortunate part of it is that it doesn't have to be that way with these alternative facilities available.

We find that the reluctance of the FAA to heed the expressed desires of the citizens in connection with the operation of National Airport is not in keeping with its own guidelines for the owners of other airports, one of the basic doctrines of which is that operational policies "must respond as nearly as possible to the desires, attitudes and values of the citizenry."

We are fearful that if activity at National Airport continues as projected, more public funds will have to be funnelled into this outmoded facility.

The residents of the Mount Vernon District of Fairfax County, living under an umbrella of aircraft using National have an obligation to express their concerns and a right to be heard. Aircraft manufacture, maintenance and control are all subject to human error as has been made abundantly clear in only recent months. We believe that bringing the Metropolitan Washington Airports into a more logical operational balance would provide a desirable factor of safety which is a fundamental precept of professional engineering or planning.

Our National Capitol is considered by many people the most beautiful city in the world. Countless millions of dollars have been spent to construct government buildings of marble to beautify the city. Certainly no one would condone the building of a heavy manufacturing plant within a stone's throw of the White House! Why then do we continue to tolerate on the

Supplement to the Draft Environmental
Impact Statement (SDEIS)

March 27, 1980

George Washington Parkway, a facility which generates thousands of tons of exhausted chemicals into the air we breathe? Is it only because we are trying to save an air traveller a more twenty minute cab ride from Dulles? Is it not, in fact, possible that this same passenger might prefer this short ride to a less crowded facility rather than going through the crush at National?

The basic problem, gentlemen, is the continued growth at National Airport. A little cosmetic treatment of whitewash is not going to make it go away. Is it not time to focus in on the real problem with a genuine effort to solve it.

Thank you.

Sincerely,

Sandra L. Duckworth
Sandra L. Duckworth
Supervisor
Mount Vernon District



COMMONWEALTH OF VIRGINIA
COUNTY OF FAIRFAX
 BOARD OF SUPERVISORS
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STATEMENT PREPARED BY SUPERVISOR DUCKWORTH TO BE READ INTO
 THE RECORD BY HER REPRESENTATIVE, COLONEL JAMES RAMBERY,
 AT THE COUNCIL OF GOVERNMENTS' PUBLIC HEARING ON SOUTHBOUND
 FLIGHT PATTERNS, May 28, 1980.

The Mount Vernon District of Fairfax County, Virginia is
 located along the west bank of the Potomac River south of
 the Woodrow Wilson Bridge. It lies in the path of
 westbound aircraft which make their turn south of the bridge
 when the wind direction calls for a southerly take-off.
 This involves approximately 80% of the scheduled turbojet
 air carriers departing from National Airport. For this
 reason, the 68,600 residents of the Mount Vernon District
 are concerned that firm guidelines be established for the
 operation of National Airport which will reduce our exposure
 to the countless low altitude aircraft flying over us each
 year, thus lessening the noise and providing operational
 safety for the greatest number of people.

Our National Capitol is considered by many people to be the
 most beautiful city in the world. Countless millions of
 dollars have been spent to construct government buildings
 of marble to beautify the city. Certainly no one would
 condone the building of a heavy manufacturing plant within
 a stone's throw of the White House! Why then do we continue
 to tolerate, on the George Washington Parkway, a facility
 which generates thousands of tons of exhausted chemicals
 into the air we breathe? Is it only because we are trying

Council of Governments
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Flight Patterns

May 28, 1980

to save an air traveler a mere twenty minute cab ride from Dulles? Is it not, in fact, possible that this same passenger might prefer this short ride to a less crowded facility rather than going through the crush at National?

The residents of the Mount Vernon District of Fairfax County, living under an umbrella of aircraft using National, have an obligation to express their concerns and a right to be heard. Aircraft manufacture, maintenance and control are all subject to human error as has been made abundantly clear in only recent months. We believe that bringing the Metropolitan Washington Airports into a more logical operational balance would provide a desirable factor of safety which is a fundamental precept of professional engineering and planning.

I have read your report discussing the results of your Demonstration Test on Southbound Departure Flight Paths. I believe this proposal to lengthen the take-off path of southbound traffic from 5 to 10 miles does not adequately address the problem of noise pollution. Nor does it record adequately the actual effects of a change in pattern. For instance, the community survey of Mount Vernon District did not include a single contact in the most southerly section of the Mount Vernon District, Mason Neck.

The report does acknowledge that there were significant increases in noise levels in the evenings during the test period, thus lowering the quality of life there, while doing little to improve noise level in the northern part of the district. The report shows that the proposed extension of take-off from 5 to 10 miles would simply attempt to transfer this problem from upper to lower Mount Vernon District. I do

Council of Governments
Public Hearing Southbound
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May 28, 1980

not feel that this attempt to transfer the burden of noise pollution from one neighborhood to another can be labeled adequate treatment.

The COG study shows that people react negatively to frequency of noise intrusions, rather than occasional intrusions. Efforts should be made to reduce the number of flights and to enlarge the affected area.

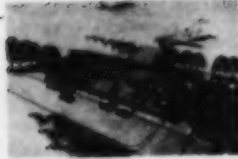
Therefore I recommend:

1. restricting the total number of flights
2. reducing operating hours
3. limiting passengers to 14,000,000 annually
4. considering a scatter take-off pattern and having planes climb faster, within noise abatement standards, before turning

I find the reluctance of the FAA to heed the expressed desires of the citizens in connection with the operation of National Airport is not in keeping with its own guidelines for the owners of other airports, one of the basic doctrines of which is that operational policies "must respond as nearly as possible to the desires, attitudes and values of the citizenry."

The air traffic of National Airport affects all of Mount Vernon District from Belle Haven to Hallowing Point, from Villamay to Gunston Manor. Shifting the burden of noise pollution will not solve the basic problem, nor will it bring needed relief to the environment affected by it. I believe it is time to reduce the size of National Airport, source of our concerns, and disperse its affects. These are the directions in which I urge you to press your efforts.

Thank you.



EASTERN REGIONAL JETPORT

Box 800, Seaboard Field
Kinston, North Carolina 28501
(919) 323-3922

R

May 30, 1980

The Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation, Public Works
and Transportation Committee
House of Representatives
Washington, D. C. 20515

Re: Notice of Proposed Policy, D. 19950
Notice of Proposed Rulemaking, D. 19948

Dear Congressman Anderson:

We herewith submit our concern as relates to the Federal Aviation Administration (FAA) proposal which would reduce service at Washington National Airport.

Since we cannot be present when your committee holds hearings on June 11, 1980 on this matter, we request that our opposition to the referenced FAA Notices of Proposed Policy and Proposed Rulemaking be recorded.

We strongly urge that Washington National Airport be preserved for short and medium haul air transportation. This speaks for the many thousand who depend on Piedmont Airlines, and others, for this service which includes our military at Seymour-Johnson Air Force Base and the Marines at Cherry Point and Camp Lejeune. Obviously, there could be a curtailment to our military posture involved here.

Our service here at the Eastern Regional Jetport is already at the minimum service level, and the FAA proposals would reduce our service frequencies below acceptable levels, thereby, producing a major impact on service quality. And what we see here is only the "tip of the iceberg", the long haul and heavy jets will surely out bid and destroy the time proven aircarriers such as Piedmont. But the real bottom line is that smaller cities will lose out on service to our nation's capitol. We, as many others who can least afford, within 300 miles of Washington will be the losers.

LENOIR COUNTY-CITY OF KINSTON AIRPORT COMMISSION

Congressman Glenn M. Anderson
May 30, 1980
Page 2

It is not important to us how many big jets have slots to Washington National. But it is important to us that the addition of more big jets does not reduce the slots available for service in short haul markets. As we study the issue, it appears that this effort by the FAA is to continue to cater to the influential and in that process neglect those of us who will be hurt most.

We submit that the Proposed Policy will cause small cities to experience substantial service losses if this proposal is adopted without modifications. We agree with the position that there should be special provisions to preserve service to cities within 300 miles of Washington National Airport. We believe that these cities can be given consideration and service protection without affecting the service in long haul markets. In fact, almost three-fourths of the slots would still be available for long haul service.

The Eastern Regional Jetport, Kinston, North Carolina, serves 700,000 citizens in Eastern North Carolina, it is on their behalf that we appeal to your committee to protect that minimum service which we now enjoy.

Respectfully submitted:

LENOIR COUNTY-CITY OF KINSTON
AIRPORT COMMISSION



VAN B HIGDON
Secretary

cc: Representative Walter B. Jones
Representative Charles Whitley
Representative L. H. Fountain



COMMONWEALTH of VIRGINIA

Council on the Environment

J. B. JACKSON, JR.
ADMINISTRATOR903 NINTH STREET OFFICE BUILDING
RICHMOND 22219
804 786-4500

June 9, 1980

Mr. David Traynham
Subcommittee on Aviation
House Public Works and Transportation
Committee
Room 2251, Rayburn House Office Building
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Traynham:

This agency recently learned of your June 11 hearings regarding Federal Aviation Administration regulations for reducing the air traffic at National Airport. We are furnishing the enclosed comments for the Subcommittee's consideration as it contemplates the issues associated with National Airport traffic.

Our comments pertain to the Draft Environmental Impact Statement, 1980 Supplement, for the Federal Aviation Administration's Metropolitan Washington Airports Policy, which we reviewed in the spring. We addressed the environmental issues for the Commonwealth after coordination with other State agencies, attendance at public hearings, and careful study. We hope these comments will be useful to the Subcommittee.

Sincerely,

J. B. Jackson, Jr.

JBjr:CHE:pw

Enclosures

CC: The Honorable Maurice B. Rowe, Secretary of Commerce and Resources
Mr. Richard Claybrook, Deputy Director, Virginia Liaison Office
Col. Willard G. Plentl, Director, Department of Aviation



COMMONWEALTH of VIRGINIA

Council on the Environment

503 NINTH STREET OFFICE BUILDING
RICHMOND 23219
801 785-4530J. S. JACKSON, JR.
ADMINISTRATOR

April 17, 1980

Mr. James A. Wilding, Director
Metropolitan Washington Airports
Washington National Airport, Hangar 9
Washington, D. C. 20001

Dear Mr. Wilding:

The Commonwealth has completed its review of the Supplement to the Draft Environmental Impact Statement on Metropolitan Washington Airports Policy. The Council on the Environment is responsible for coordinating the State's review of environmental impact statements and responding to appropriate federal officials on behalf of the Commonwealth. The following state agencies took part in the review of this document:

State Air Pollution Control Board
State Office of Emergency and Energy Services
Office of Transportation
Department of Aviation

While the proposed policy is generally consistent with the Virginia Department of Aviation objectives, the Commonwealth has a number of concerns relating to the Supplement. One is that the document failed to accomplish the rigorous exploration of all reasonable alternatives that is at the heart of the process mandated by the National Environmental Policy Act. Other concerns are reflected in the detailed comments (attached) of individual reviewing agencies.

The Commonwealth agrees that it is important to define an appropriate relationship between the Washington area airports in order to address growing public concern over congestion, noise, and safety problems at National Airport and to make better use of the untapped capabilities of Dulles Airport. Making better use of Dulles will require that mass transit to Dulles from Washington and the inner suburbs be greatly expanded in the interests of energy conservation, air quality maintenance, and traffic control. In addition, the provision of emergency services for accidents at Dulles should be addressed.

National Airport is at or near the limit of its capacity. Any increase in its traffic would tend to raise ozone and carbon monoxide levels in the Northern Virginia suburban area and thus risk violating the State Implementation Plan. Policy elements in the Supplement fail to provide alternatives to further growth. One element in the proposed policy called for evaluation of a 1000-mile perimeter, for example; the Commonwealth prefers that the 650-mile perimeter be retained and the "grandfather" cities deprived of their present exemption in the interest of reduced takeoff weight, less noise, and fewer operations at National.

E. FOLGER TAYLOR, CHAIRMAN
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ELIZABETH H. HASKELL, VICE CHAIRMAN
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RICHMOND

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YORKTOWN

CARL C. REDINGER
ALEXANDRIA



COMMONWEALTH of VIRGINIA

State Air Pollution Control Board

ROOM 106, NINTH STREET OFFICE BUILDING
RICHMOND, VIRGINIA 23219
TELEPHONE: (804) 380-2378

W. R. MEYER
EXECUTIVE DIRECTOR

April 4, 1980



Mr. Charles H. Ellis
Environmental Impact Statement Coordinator
Council on The Environment
903 Ninth Street Office Building
Richmond, VA 23219

Dear Mr. Ellis:

After reviewing the Metropolitan Washington Airport Policy Supplement it is apparent that no perfect solutions exist. To increase the congestion at National by increasing their capacity could only worsen the air pollution in that area. However, to force people to drive more miles out to Dulles is not only counter productive to the goals of this agency but would also consume more energy. It would seem that the negative aspects of increasing operations at National outweigh those of redirecting people to Dulles.

As you are aware the Northern Virginia area does not attain the ozone or carbon monoxide standard. At this time, any policy which adds to the ozone or carbon monoxide pollutant burden in that area, above what is expected under normal growth conditions, is not consistent with nor does it conform with the goals and objectives of Virginia's State Implementation Plan.

The proposed policy does not appear to accelerate growth but rather shift it from National to Dulles and the Baltimore - Washington airports. Increased emissions related to additional miles traveled could be offset if adequate mass transportation is provided.

Sincerely

John M. Daniel, Jr.
John M. Daniel, Jr.
Assistant Executive Director

JMDJr/NPP/nkv

cc: Region VII, Hank Hughes, Sam Helms

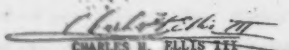
"An Equal Opportunity Employer"

8. REVIEW INSTRUCTIONS:

- A) Please review the document carefully. If the proposal has been reviewed earlier (e.g., if the current document is a FINAL EIS), please consider previous comments.
- B) Prepare your agency's comments in a form which would be acceptable for responding directly to a project sponsoring agency.
- C) Use the space below for your comments. If additional space is needed, please attach extra sheets.

Return your comments to:

Charles H. Ellis III
Environmental Impact Statement Coordinator
Council on the Environment
903 Ninth Street Office Building
Richmond, Virginia 23219


CHARLES H. ELLIS III
ENVIRONMENTAL IMPACT STATEMENT COORDINATOR

COMMENTS

This agency has reviewed subject document primarily from an emergency services standpoint, namely the additional burden that could be placed on jurisdictions in close proximity to both Dulles International and Washington National Airports due to the increased probability of a serious aircraft accident resulting from additional traffic brought about by the proposed policies. While the emergency services area is not addressed in this EIS, it must be considered, especially in view of the increase in traffic at Dulles International under the restricted-growth alternative, which is considered the most logical. The increase in traffic definitely increases the probability of an accident involving aircraft during departures and arrivals; however, the fact that Dulles International is situated in a largely rural area and occupies a vast amount of land, it does not appear that an additional burden for emergency services would be placed on local jurisdictions. A general review of energy consumption resulting from the restricted-growth alternative indicates that while surface traffic consumption would increase somewhat, it could be reduced considerably by a continued effort toward developing a mass transit system from Dulles International to the downtown and suburban Washington areas.

(SIGNED) George L. Jones
(TITLE) State Coordinator
(AGENCY) State Office of Emergency and Energy Services

COMMONWEALTH of VIRGINIA

Department of Aviation
4508 South Laburnum Avenue

Statement of the Virginia Department
of Aviation on the Proposed Policy
for the Operation of the Metropolitan
Washington Airports.

Mr. Chairman, we would like to thank you for this opportunity to offer our comments on the recently published Supplement to the Draft Environmental Impact Statement (D.E.I.S.) of March, 1978. We praise the Metropolitan Washington Airports Division of the Federal Aviation Administration for the comprehensive document which has evolved. Its publication has come at a time when issues like air transportation, land use planning, energy, and environmental concerns are critical to the future development of the Northern Virginia Region.

It is because of the potential catalytic effects from this policy that we have carefully reviewed the document and have the following comments to offer:

- A) The Department believes that the FAA's proposal to reduce Air Carrier operations to 36 per hour, raise commuter operations to 15 per hour, and lower General Aviation operations to 9 per hour offers a realistic method of controlling passenger growth at National Airport. Increased commuter access will also alleviate the disparity between the demand for and the availability of commuter slots.

- B) The FAA's proposal to place a 9:30 PM to 7:00 AM curfew on National for air carrier and commuter operations is perhaps the best method available to both control passenger growth and improve the environment around National Airport. If passenger growth is carefully monitored in the future, the operating curfew can be expanded as wide bodied aircraft are introduced and Air Carrier operations are further reduced.
- C) The Department is extremely concerned about the implication of a 1,000 mile perimeter rule. Today, the average stage length of trunk carriers such as United and Eastern is only slightly more than 650 miles. A 1,000 mile rule will mean that National will become a facility offering all levels of air line service rather than its desired role as a medium and short-haul facility. Further, the SDEIS does not include a comparison between the noise and pollution levels of similar aircraft operating a 150 mile stage length versus a 1,000 mile stage length. Obviously, a comparison would have shown higher noise and pollution levels for at least 50% of the operations involving the longer stage length flights. We also believe that the only way to adequately encourage the greater use of Washington's other airport is to discontinue the exemptions granted to the seven "grandfather" cities. Therefore, the Department believes that the FAA should formally adopt a 650 mile perimeter rule at National without the current exemptions.

D) The Department believes that the final ceiling on passenger growth at National should never exceed 10,000,000 passengers. Therefore, if that ceiling has not been reached by 1985, passenger growth should not be allowed to grow to meet the ceiling, but should remain at the 1985 level.

E) One of the key elements of the FAA Proposed Policy is to shift a significant amount of the current air carrier activity at National Airport to Dulles International. In the past, much of the lack of activity at Dulles International has been attributed to poor surface access and the resultant public decision when given the choice, to use National instead of Dulles International Airport.

We cannot overemphasize the need to rectify this situation, for without a solution, the Proposed Policy will be meaningless rhetoric. One of the prime solutions to the access problem is the rapid completion of the Dulles Access Road Extension and Interstate 66. Although this point is covered on Page III-36 of the supplement, its potential impact on the increased utilization of Dulles International cannot be overstated. The direct link with Interstate 66 will greatly expand the ground service area of the airport and provide for the accessibility from the Washington, D.C. area so critically needed to make this policy work.

The revised November, 1981 completion date of the Dulles Access Road Extension and Interstate 66 by the Virginia Department of Highways and Transportation must

be afforded one of the highest priorities in whatever policy is adopted.

- F) The issue of increased General Aviation utilization at Dulles International is one that we have been closely involved with for the past five years.

The Virginia Air Transportation System Plan published in August 1975 recognized the need for two additional General Aviation Airports in Northern Virginia to be operational by 1990. However, due to financial, environmental, and land use constraints it is highly unlikely those facilities will ever be constructed. In addition, there is the distinct possibility that several privately owned, public use General Aviation Airports in the Metropolitan Washington area will cease to exist because of encroaching development. This leaves us with a peculiar problem; to provide adequate General Aviation capacity with a decrease in the number of airports.

It is because of this, that we again ask for development of a separate General Aviation facility on the Western side of the Dulles International site. The addition of a General Aviation runway, apron, hangars and terminal space would help to meet the urgent General Aviation needs of the region. If at such time in the future that this proposed General Aviation runway be required for air carrier use, it has only to be expanded.

The separate facilities will allow the segregation of slower General Aviation aircraft from the larger and faster Air Carrier types. This would allow Dulles

International to effectively absorb air carrier operations from National and still provide relief for the ever increasing General Aviation demand in Northern Virginia.

In conclusion, we would again like to thank you for this opportunity to offer our comments and praise your efforts in soliciting public input while developing a policy for planned aviation growth in the region.

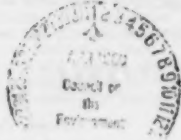


COMMONWEALTH of VIRGINIA

Office of the Governor

Richmond 23219

April 1, 1980

George M. Wathers
Secretary of TransportationMEMORANDUM

TO: Mr. Charles Ellis, III
Environmental Impact Coordinator

SUBJECT: FAA Draft Environmental Impact Statement Supplement
on Metropolitan Washington Airports

We appreciate this opportunity to review the Draft Environmental Impact Statement regarding optional policies for the future operation of the Metropolitan Washington Airports. The Department of Aviation has overall responsibility for aviation matters in the Commonwealth, and has submitted detailed comments on the draft statement. The Governor concurs with the statements of the Department. We feel that it is important to identify a proper role for Washington National and Dulles International Airports with respect to commercial air carrier, commuter, and general aviation operations in the region and to provide adequate highway and other ground transportation facilities to the airports in support of these development policies.

The Commonwealth has expressed in the past the need for expanded promotion of Dulles International Airport, especially for long-haul and connecting passenger flights, as well as freight service. Adoption of the restrictions on aircraft operations and passengers at Washington National Airport will be a step in the right direction for accomplishing this if the Dulles facility is properly promoted and developed to its full potential as a domestic and international gateway. Completion of improved highway or other ground access to Dulles is also critical to this expanded role for the Dulles facility.

I trust that these comments, plus those of the Department of Aviation, will be of assistance to you in developing a policy for planned aviation growth in the Metropolitan Washington area.

Hiram R. Johnson
Hiram R. Johnson
Assistant to the Secretary

HRJ/jd



COMMONWEALTH of VIRGINIA

Council on the Environment

200 COMMONWEALTH
ADMINISTRATION300 NORTH STREET GOVERNMENT BUILDING
RICHMOND 22209
803-355-4332

April 17, 1980

MEMORANDUM

TO: J. B. Jackson, Jr.

FROM: Charles M. Ellis III *Handwritten signature*SUBJECT: Staff Evaluation of the FAA Draft Environmental Impact Statement Supplement,
"Metropolitan Washington Airports Policy"

The staff of the Council on the Environment has reviewed the subject document in some detail. Staff members have attended public meetings on the issues raised by the document. Accordingly, the staff offers the following comments.

The new 1979 regulations governing compliance with the National Environmental Policy Act (NEPA) apply to the Supplement "to the fullest extent practicable" notwithstanding their effective date after the Draft Environmental Impact Statement publication date.

From the standpoint of complying with the language and spirit of the NEPA, the document is inadequate. The heart of the NEPA process - the one purpose that is central to the exercise - is to rigorously explore alternatives to a proposed action, so that decision-makers can grasp not only the environmental impacts of a given proposal, but also the environmental consequences of alternative proposals. In this instance, it is obvious that the FAA is intent on continuing growth at National Airport. Nowhere has FAA given a fair assessment of the environmental impacts of either stopping growth at National or reducing the current size of the facility, an option favored by a great many of the citizens participating at the hearings held to solicit public input. Nowhere in the document does the FAA adequately address the ground transport problems of National and Dulles. While the FAA is currently a co-sponsor of the Dulles access highway, this impact statement, which is critical to the futures of the airports, does not seriously consider rail access to Dulles. In short, unless significant issues are addressed in the final EIS, it is extremely doubtful that any decision on airport policy will be made on the strength of a valid understanding of the environmental consequences, such as can only come through a hard look at all reasonable alternatives. A decision on the existing evidence would not comply with the spirit of NEPA, and would make a mockery of the EIS process as a planning instrument.

The document is supposed to describe environmental impacts of proposed actions and alternatives. Insofar as it discusses the impacts of changes in operating perimeters (page V-25), the document is deficient in that it does not state whether there will be a difference in takeoff noise between flights to cities 650 miles away and flights to cities 1000 miles away. Because of the greater effort required to lift a greater amount of fuel, it is logical to assume that takeoff noise would be greater for longer flights; but the

document does not describe the difference or endeavor to determine whether it can be offset by compliance with FAR Part 36 noise requirements (page III-5) to be implemented in the future.

The section on the relation between short-term advantages of the proposed action and the maintenance of long-term environmental productivity should discuss how the advantages either enhance productivity or merit a degree of trade-off with it in light of pressing needs for the proposed action. Short-term advantages should also be demonstrably preferable to the status quo. In the Supplement, the discussion of this topic fails to show that the proposed policy would improve the present situation in any decisive way over the long term; the short-term advantage is limited to that stemming from stopping the scheduling hours at 9:30 instead of 10 PM and closing the airport at night. The policy in itself does not provide the air quality improvement claimed for it in this section; rather, that improvement comes from separately mandated emissions standards for automobiles and airplanes.

The section on irreversible and irretrievable commitments of resources fails to describe any of these commitments or their meanings in the context of the Supplement. What should be discussed here is the extent to which the proposed policy elements, as compared with their respective alternatives, would, directly or indirectly, commit the area, the airlines, and the air travelers to pursuit of activities that would result in greater or lesser consumption of fuel, coexistence with unhealthful levels of noise and unsafe flight operations, convenience in flying to or from the Washington area, and other matters properly raised by the discussions in the document. Certain policy choices can set in motion forces (economic, or social, or environmental) that will, over the long term, have a generally detrimental effect on urban and suburban quality of life, or a generally beneficial effect on such a singular trend as energy consumption. It should be FAA's function in this exercise to make an effort to identify these effects and trends in order to fortify the discussion of alternatives.

As indicated earlier, the Supplement fails to undertake serious discussion of all reasonable alternatives and to rigorously examine the impacts of each. Thus the alternatives of freezing the numbers of passengers and operations at National and actually reducing those numbers (to, for instance, 1978 levels) are not even mentioned in the document. Certainly these alternatives are reasonable in light of the congestion, noise, and attendant controversy resulting from the present situation. Secondly, the Supplement fails to address the effects of increased use of Dulles Airport on the transportation facilities of the area. Since the proposed policy calls for increased use of Dulles, the document should address transportation to Dulles. Specifically, the FAA should consider the provision of mass transit to Dulles from Washington and the inner suburbs by rail (the Supplement concedes on page III-36 that there is room for rails along the Dulles Access Road) or bus or some effective combination of the two. A combination of emphasis upon increased use of Dulles and provision of mass transit thereto would result in operation of beneficial complementary forces in that increased air travel through Dulles would create demand for mass transit while improved transit availability would contribute to the demand for travel through Dulles. These forces would reduce the demand for air service through National. This interaction would be wholly beneficial to local energy consumption and air quality, as well as to the goal of rationalizing the airports' use patterns. It deserves proper consideration in the environmental impact statement supplement.

The inadequacies in the supplement make it difficult for us to comment on the policy proposals as knowledgeably as we would like. However, in light of the problems that exist because of the present practices at National, we feel justified in supporting the following concepts or initiatives:

- (1) Retain the 650-mile nonstop perimeter and eliminate the exemption for the seven "grandfather" cities;
- (2) Reduce air carrier activity from 40 operations per hour to 30, and count extra sections in the 30. Stop scheduled flights at 9 PM.
- (3) Reduce commuter activity from 8 to 6 operations per hour. Stop these operation (cheduled flights) at 9 PM.
- (4) Close National from 9:30 PM to 7 AM except for emergencies.
- (5) Introduce wide-bodied airplanes to National, if at all, following extensive safety, energy use, and noise studies, and then on the basis of one wide-body introduced for each two smaller planes taken out of service.
- (6) Take definite steps, in conjunction with other appropriate authorities, to provide mass transit service to Dulles Airport from Washington and the inner suburbs.

It is our sincere hope that the FAA will bring the Final Environmental Impact Statement into better compliance with NEPA as outlined above, and that the Final Environmental Impact Statement will reflect that serious attention and some commitment has been given to our recommendations.

CHH:gcj



COMMONWEALTH of VIRGINIA

Council on the Environment

J. B. JACKSON, JR.
ADMINISTRATOR801 NINTH STREET OFFICE BUILDING
RICHMOND 23219
804 788-4500

May 6, 1980

Mr. James A. Wilding, Director
Metropolitan Washington Airports
Washington National Airport, Hangar 9
Washington, D. C. 20001

Dear Mr. Wilding:

Attached are comments on the Supplement to the Draft Environmental Impact Statement on Metropolitan Washington Airports Policy which were provided by our Department of Highways and Transportation. Please add these to the Commonwealth's comments, which were sent to you on April 17. Thank you very much.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. B. Jackson, Jr." followed by a flourish.
J. B. Jackson, Jr.

JBJr:CHE:pw

Enclosure

CC: The Honorable Maurice B. Rowe, Secretary of Commerce and Resources
Mr. Paul Regenmuller, Department of Highways and Transportation



DEPARTMENT OF HIGHWAYS & TRANSPORTATION
1221 EAST BROAD STREET
RICHMOND, 23219

ALDO E. BUSSETT, III
DEPUTY CHIEF ENGINEER & CHIEF ENGINEER

J. T. HARRIS
DIRECTOR OF CONSTRUCTION

A. M. WILLY, JR.
DIRECTOR OF OPERATIONS

DAVID R. PERKINSON, JR.
DIRECTOR OF PROGRAM MANAGEMENT

W. L. BRITTLE, JR.
DIRECTOR OF ENGINEERING

GORDON K. MASTY
DIRECTOR OF PLANNING

IN REPLY PLEASE REFER TO

R. L. HUNDLEY
ENVIRONMENTAL QUALITY ENGINEER

FAA Draft Environmental Impact
Statement Supplement on
Metropolitan Washington Airports

Mr. Charles Ellis
EIS Coordinator
Council on the Environment
Ninth Street Office Building
Richmond, Virginia 23219

Dear Mr. Ellis:

Thank you for providing us with an opportunity to review the subject document. We concur with the procedures of the proposed policy in the report, as it seems to produce less impact with the gradual transition of airport functions. In addition, we concur with the attached Draft Metropolitan Washington Council of Government's (TPB/COG) comments pertaining to the Ground Transportation Impact, page 8.

It was noted that the report's proposed policy will impact the roadway systems surrounding both National and Dulles Airports. By the year 1990, Route 28 (Sully Road) in the Dulles Airport vicinity is anticipated to operate at level of service F, assuming that the roadway is not widened prior to 1990.

The Route 1 (Jefferson Davis Highway) corridor in the vicinity of National Airport may not be constructed as originally proposed. Therefore, a level of service A, as indicated in the report for this section of roadway (Table III-5), may not be achieved. A much lower level of service, C or D, may be more realistic here.

METRO may not be able to adequately serve many of the major employment/commercial centers, particularly in the Dulles area. Further consideration should be given to a satellite parking and shuttle program offering additional passenger service to these centers in order to relieve the expected traffic congestion around Dulles.

Sincerely,

R. E. Hundley
R. E. Hundley
Environmental Quality Engineer



2. In the development of noise contours for Dulles, six Concorde operations daily are assumed in 1990. Since COG opposed the introduction of Concorde service at Dulles and in view of the fact that the noise levels associated with Concorde operations are a source of noise complaints at Dulles, it is recommended that the current level of operation not be increased in the future.

Ground Transportation Impact

1. National

The level of service analysis for roadways surrounding Washington National Airport indicates that Route 1 north of the Rte. 233 Viaduct will change from level of service E in the base case to A under the proposed 1990 policy. This results from the proposed development of I-595. South of the Route 233 Viaduct, the level of service changes from C to F due to increased volumes and roadway configurations.

On the George Washington Memorial Parkway, the primary access route to the airport, the level of services north of the airport changes from B to C. However, since the airport peak periods coincide with commuter peak periods, the projected level of service on the G.W. Parkway is questionable. This is particularly true in light of the fact that, on Route 1 south of the airport, level of service F will exist. It would appear that the overloading of Route 1 would divert more traffic to the G.W. Parkway than is assumed in the DEIS.

The DEIS assumes greater patronage on the Metrorail system but does not present the traffic impacts under the different scenarios tested.

Assumptions regarding the use of Metrorail should be documented, and a sensitivity analysis conducted as to the varying traffic volumes associated with each scenario.

2. Dulles International Airport

The FAA is urged to expedite the construction of the Dulles Airport Access Road Connector in order to enable effective management of I-66.

Air Quality Impact

The Air Quality Impacts discussion presents the impacts likely to occur from this proposed policy using, where appropriate, pertinent existing condition information from the March 1978 Draft EIS.

The analysis of base and forecast year data was calculated by dispersion modeling. The results are subject to some question because:

- 1) Such modeled data are useful for nonreactive gaseous pollutants (CO and SO₂) but only to the extent that the results can be compared to properly operated array of monitors;

160 STATE STREET, ALBANY, NEW YORK 12207 • PHONE: 518/485-3947



Associated Industries of New York State, Inc.

Dear Mr. Johnson
Enclosure
June 10, 1980
CH 131980
Conte D.H.

RECEIVED

JUN 13 1980

Honorable Harold T. Johnson
 Committee on Public Works and
 Transportation
 U.S. House of Representatives
 Rayburn House Office Bldg. Room 2165
 Washington, D.C. 20515

U.S. HOUSE OF REPRESENTATIVES

Dear Congressman Johnson:

In relation to the Subcommittee on Aviation June 11 hearing relative to the Department of Transportation's Proposed Policy for Metropolitan Washington Airports, I am submitting a letter of April 11 dealing with the subject.

Associated Industries of New York State would be glad to submit additional testimony if desired.

Sincerely,

Alvin G. Mardon

Alvin G. Mardon
 Director/Member Relations

mlk
 Enclosure

ASSOCIATED INDUSTRIES OF NEW YORK STATE, INC.
150 STATE STREET ALBANY, N.Y. 12207

OFFICE OF THE PRESIDENT

11 April 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, SW
Washington, D. C. 20591

Attention: Rules Docket AOC-24; Re: FAA Notice 80-2

Gentlemen:

On behalf of Associated Industries of New York State Inc., an organization representing the interests of 3,400 industrial and commercial entities, I would like to vigorously protest implementation of the above-noted proposal that would curtail flight operations at Washington National Airport.

We would urge adoption of the Air Transport Association position regarding this matter.

Short of an outright elimination or easing of quota restrictions, the flexible formula proposed by ATA would be more beneficial to a larger number of air travelers.

Curtalement of flights would seriously affect business operations that depend upon rapid and frequent access into and out of the Washington area. Losing this ability would hinder the economic operation of major industrial members of this Association.

Often it is necessary on very short notice and at odd hours of the day for members of industries and businesses affiliated with Associated Industries to meet with key governmental representatives on a variety of subjects vital to the economic well-being of this State.

Impairment of this ability to meet in Washington would be of major concern to our Association.

I strongly urge that the proposal (FAA Notice 80-2) not be implemented.

Sincerely,

Raymond T. Schuler
President

RTS/ps

June 3rd, 1980

Miss Alix M Marr
Ashton Place
12901 Kitchen House Way
Germantown, Maryland 20767

Dear *Mr. Anderson*

I am a flight attendant with Eastern Air Lines based in Washington, D.C. I hope you will give me 5 minutes of your time to examine and to respond to a very serious problem involving the safety of your people.

On February 7th, 1980 my new car was vandalized extensively in the employee's parking lot at Washington National Airport, Washington, D.C. Through investigation I discovered that there were 4 other cars vandalized on that same day at the airport!

I posted a petition for better airport security hoping to receive some support from other "parking lot victims". In only six weeks I received more than 1200 signatures from just those of us who use the employee's lot. (See attached petitions) And not only signatures, but also stories of stolen cars, slashed tires, broken windows, verbal threats, attempted rapes, etc. Some of these happenings are included on the following sheets. These names all have very real people behind them; worried people, frustrated, fearful and certainly angry!

I have met with Captain Morehouse and Chief Daniel Kriss of airport security in an attempt to understand why this is such a problem of such continuing severity. I could site literally thousands of incidents since the opening of the airport, but they all would be variations of my car incident and others many sadder. Instead I wish to call to your attention some of the reasons for this constant increase in crime.

FACT Washington National Airport is supposed to have a police force of 119 Patrolmen at all times.

FACT As of February 20th, 1980 the airport was 32 Patrolmen short!! WHY?

The pay scale is one good reason. The patrolmen that are hired to work the airport are Grade #4 which means that they are the lowest paid officers earning a salary of \$10,049.00 which hardly feeds one in Washington, D.C. much less a man with a family of two or three! Because of this the turnover of patrolmen is unusually high. As the officer graduates to Grade #5 he leaves the airport. So is it any wonder that the force is always inadequate?

The primary job of security is the screening of 15 individual boarding gates. By the time these gates are covered there are usually only 2 or 3

pairs of patrolmen left to cover 6 lots! Sometimes a parking lot may not be surveyed for as long as half-an-hour or more due to the lack of manpower. It's not surprising that the crime rate continues to escalate!

FACT An unbelievable crime catalyst was the opening of the mass transit system-Metro-at the airport 1 1/2 years ago--the crime rate has doubled! Washington National Airport opened in 1961 carrying 344,257 passengers. In 1979 over 15,000,000 people utilized the airport. 45 times over! The police force certainly has not increased proportionately!

FACT It takes a criminal 3-5 minutes to break into a car--even less time to 'hot-wire' it and drive it away. With the mobile units only able to patrol each of the 6 lots every half an hour or so, we might as well leave our car doors unlocked and leave the keys in the ignition!

FACT The other employee lots in other cities are usually covered by an electronic gate and/or a guard. In Washington, D.C., one of the biggest crime cities in the USA, we have virtually an unprotected lot! I would also like to include Baltimore Washington International Airport which is developing similar problems due to insufficient patrolling!

I hope this letter will awaken upper management to the fact that we at National and Baltimore Airports are tired of being constantly worried about the safety of our cars while we are flying. Most of us feel forced to leave our new cars at home and drive what we fondly term our older 'airport cars' to the airport due to this fear---if this isn't intimidation I don't know what is!!

A full-time guard must be armed due to the fact that he would be dealing with armed criminals-not 16 year olds. This requires a police officer. This means expense. But to pay a police officer \$15,000.00 in one year really isn't so expensive when you stop to consider that in one day at the airport there may be more than \$15,000.00 worth of damages. Another alternative is installing a Rusco Gate system operated with magnetic cards. The gate would be a one-time cost of approximately \$6,000.00 and the employees would each purchase their own cards. I know that not all crime can be stopped but something must be done to at least try to deter it!!

I'm sure it is only a matter of time before someone is seriously hurt or killed in the employee's lot because we come and go at such strange hours and also we are frequently alone. Why not try to stop this inevitability before there are more statistics to report!?!

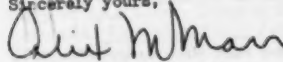
I am the self-appointed spokesperson for the airport. I have spent much of my time and money in an attempt to increase people's awareness of this problem and also to resolve it as much as is humanly possible. I will continue my 'crusade' until the results meet with my satisfaction.

With regards to further discussion I am willing to meet with you at your earliest convenience or via phone communication at:

301-972-0003--please leave a message--
301-972-4545
301-948-3016

Speaking for the hundreds of concerned airline employees at Washington National Airport and Baltimore Washington International Airport, we thank you in advance for your attention regarding this very old and very critical problem. Your comments, suggestions, and of course positive action will be greatly appreciated!

Sincerely yours,



Alix M Marr (Miss)

Attachments

Copies to: Neil Goldschmidt-Secretary of Transportation
Hugh Riddle, Jr.-Washington National Airport Manager
James Wilding-Director of Safety of Metropolitan Washington Airports
Langhorne M. Bond-Chief FAA Administrator
Colonel Frank Borman-President of Eastern Air Lines
Albert V. Casey-President of American Air Lines
Dan A. Colussy-President of Pan American Airways
Tom Davis-President of Piedmont Air Lines
Percy A. Wood-President of United Air Lines
Edwin I. Colodny-President of U.S. Air

Gunman at National Airport Car Park Kidnaps Man, Later Robs 3 Others

By Sheila Knight

Washington Post Staff Writer

Ronald Beck was getting out of his car in a parking lot at Washington National Airport Tuesday night when a gunman forced him back in and told him to drive to the District. Halfway across the 14th Street Bridge, the man fired one shot in the air to show that the gun loaded.

Beck was released unharmed shortly afterward, but the man fled in his car.

It was the first of three such armed robberies in about three hours that night in the same parking lot at the airport. No one was injured.

Airport police believe that one man is responsible for all three robberies. Each time, the robber was described as a black man in his mid-30s, somewhat disheveled and reeking of alcohol.

It all began about 8:15 p.m. when Beck, a 44-year-old Fairfax County resident, was getting out of his car in a parking lot near the North Terminal and the Metro station. The man forced Beck into the driver's seat and sat next to him on the passenger side. He placed the gun to Beck's side and told him to drive.

As they were riding, the man told Beck he had two children in the hospital and took Beck's wallet, containing \$150 and credit cards. At Fourth Street and Massachusetts Avenue NW, the man told Beck to get out of the car. Beck did and the man drove off.

Beck borrowed a quarter from a woman passerby and telephoned D.C. police. About 8:45 p.m., D.C. police picked Beck up and took him to headquarters, where he filed a report.

About an hour later, as Beck was still giving a report to police, his car was found by a D.C. police officer in a parking lot at 1415 H St. NW. A man was tampering with the car. He was later arrested, but Beck told police it was not the person who had robbed and abducted him.

At 9 p.m., Robert Moore arrived on the Eastern shuttle from New York. He headed for his car in the short-

term parking lot B, about 10 to 15 feet from the pay booth.

"I had put my two brief cases on the seat and was getting up, when a little fellow came on like a wine, saying, 'Cuse me, 'Cuse me.' I said, 'Excuse me' and tried to close the door when he pointed a pistol-plated revolver at me. My immediate reflex was to hand him my wallet, I said, 'Excuse me.'"

"As he started slipping in, I started slipping out," said Moore, who by now had grabbed his briefcases containing his company's annual reports. "I was willing for him to have my car, my money, but not my briefcases."

Moore, a 38-year-old vice president of an insurance brokerage firm, said, "I was in the process of excusing myself when he said, 'If you move another step, I'm going to drop you where you are.'"

"I didn't think he would get a good shot at me," Moore said. "I said (to myself) this guy is so spaced and hostile, the best thing is to get out of his way."

So Moore ran. He ran to the North Terminal, where he told his story to an airline employee who called the airport police.

Meanwhile, John M. Forrester had picked up Sheila Alley and her 23-month-old daughter, Melinda, who had arrived on Flight 508 from Atlanta.

Shortly after 9 p.m., they were getting into Forrester's 1973 dark green Opel, which was parked in the same area where Moore moments earlier had been accosted. As they were getting into the car, a man reeking of alcohol and pointing a gun told them "he had to go" out of the parking lot.

"He appeared out of nowhere," the 38-year-old Alley said.

Alley, who was placing her daughter in the back seat when the gunman stuck the gun in her back, said, "It took a minute for it to dawn on me what was happening."

"He appeared out of nowhere," the purse," said Forrester, a GSA employee. "Fortunately, neither of us had any cash, so he forced me to take the

keys out of my pocket and give them to him."

The man then forced the three away from the car. He drove through the pay booth gate without paying the attendant at Terminal and Alley reached the booth. The attendant called the police.

"I happened to be in the wrong place at the right time," Forrester said. "There is nothing to be said to have a gun stuck in your face. We were lucky nobody got hurt."

"I would like to have my car back," said the 42-year-old Forrester, who late yesterday still had no word of the whereabouts of his car. "If he is caught, he'll probably be out on the street in a couple of hours."

Police late yesterday said they had made no arrest.

Moore said that the 9 p.m. robberies could have been prevented if D.C. police had notified airport police of the earlier incident involving Beck.

An airport spokesman said airport police were called by D.C. police Tuesday night and told of Beck's robbery and abduction. However, the spokesman said he did not know what time the call was made.

A D.C. robbery squad investigator said that generally a victim in this particular case would have been advised to report the incident to local authorities — meaning the airport police. However, the District police would investigate the kidnapping report, the investigator said.

Moore said Beck appeared at the airport police office about 10:30 p.m. to report the incident while Moore was still there.

An airport spokesman said airport police, D.C. police, and the FBI are working on the case.

Meanwhile, Alley said she had received a telephone call yesterday from Alexandria police who told her that her wallet, containing her credit cards and identification, had been found.

According to an Alexandria police spokesman, the wallet was found Tuesday night in an alley in the 3800 block of Mount Vernon Avenue.

[illegible]

Well, if you've
had this happen
to you - I'd
appreciate an
extra note.

VANDALISM

over 100
750
100
for

This is a continuation of my
earlier petition regarding the
need for better security in our
employees parking lot.

As stated before, 5 cars here at
the airport, on Feb. 5th, 1980
were extensively vandalized -
mine to the extent of \$1,200.00

I need all the show of support
from you in order to impress
"higher ups" that we are
serious about finally getting
a full TIME guard in our lot.

So, if you have not already
signed the other petition -
please sign this one!

Every day the statistics
grow - with your support
I am willing to try to stop it!

★ Sign beneath Thank you
Alvin Mann

3/14/80 ALL petitions will be removed April 11 - please sign if you haven't already.
VANDALISM

This is a continuation of a petition in an attempt to deter our 'daily' problem of ~~vandalism~~ here in our employee's lot.

I have over 1300 signatures, but 100% participation will obviously make a much greater impact on the 'higher-ups'.

Please Sign if you have not done so already.

Progress is being made! MAILING to 12 'higher-ups' on April 12th.

Thank-you
 Amman

Signatures:

<i>[Signature]</i> UAL	<i>[Signature]</i> AAN
<i>[Signature]</i> UAL	<i>[Signature]</i> UAL
<i>[Signature]</i> EAL	<i>[Signature]</i> AAN
<i>[Signature]</i> UAL	<i>[Signature]</i> UAL
<i>[Signature]</i> EAL	<i>[Signature]</i> UAL
<i>[Signature]</i> EAL	<i>[Signature]</i> UAL
<i>[Signature]</i> EAL	<i>[Signature]</i> EAL
<i>[Signature]</i> DAL	<i>[Signature]</i> UAL -002-

2/27/8

This is a continuation of the petition ¹ against vandalism in this lot. → Better security

Please sign if you haven't
already.

Progress is being made.

I'll keep you informed after Mar. 15th - after I've met with several different higher-ups.

Thank for your support

Atty. C. Mayhew
Charlie Krouse
Ken Compton

Alm Man
USAIR
11

2. *Sp. 1*

WAL
FAL

33. milk

UAL

SPR. 1961 (car 3 over)

11/12/20

21. 11. 1900

EAL

2AL

C. M. K. L. CAC

James Earl Cadden UAL
Long B. Spring EAL
Carmen & Medavil UAL
Gula Aris UAL
San Acandi UAL
KK Lenzell UAL
John Ratty AA
Lindsey Simpson EAL
McChillig's UAL
McWilliam's UAL
Blackwell EAL
Trish Hoth EAL
K.K. Wye UAL
S. Ivy AA
B.L. White AAL
W. Beckwith UAL
Marty Spence USAR
D. Kiritaky EAL
Hawn Caffey EAL
Linda Nelson EAL
Clas E Smith EAL
Mrs Hoffman UAL
Hein Feldman USAIR

Robert C. Ashley UAL
S. Kohlenstein - V.S. Air
K Taylor AA
J. Bonnett EAL
John E. Bone UAL
John C. Deage UAL
Spil Wallace USAR
Moran UAL
Steph Jutts EM
Camp Chapman AR
Pink EAL
William EAL
Aberg EM
Eg Reina EAL
Frank Reynolds AA
S.M. Collet UAL
A.J. Buthe EAL
Ed King AAL
J. Fairer AR
C. Menton AAL
T.C. DeFouch AA
V. Deans UAL
J.V. Edwards EAL
Da Zunderland AAL

Chatterman USAir
 441 T/M Lewis EAL
 F/A USAIR & Bawdlow-Air

F/A USAIR & Bawellow-Ar

I.O. Corale E.A.L

McSweeney aal

Herb England EAL

Mr Woodside and
Mr. King 115-10

Experience in Work
Re: This Work

Paul Bros. USA, R

14. Helen E. H.

Dr. H. J. Gray & A. L.

Handwritten: f. Hinkel EAL
1882 14 11

BQ Laputni AA

RD Lindholm USA
 To Lenn Dahl

7C Lamm HH-
P R Morse DCA

A. K. K. K.

50

c/B stolen

1

William Conrad
 Betty Hunt
 Sam Fisher

Charles D. Smith EAL
 Carolyn Day W
 P. B. B. EAL
 S. O. D. EAL
 P. B. EAL
 P. B. EAL

W. T. P. AAL
 Karen Smith

Constance, Mackay PI
 K. G. EAL
 K. G. EAL

W. E. D. EAL
 M. Norton, EAL

Janette Johnson PI

W. E. EAL
 A. L. EAL

A. L. EAL

Ken Egge EAL

William F. H. WAL
 Rogers, H. V. S. A.
 J. H. AAL

W. E. EAL
 M. E. EAL
 C. E. EAL

J. E. EAL
 * J. E. EAL
 * J. E. EAL

1st time, 2nd time, 3rd time
 2nd time, 3rd time, 4th time
 to end of 2nd time, 3rd time
 into real car (think) & still
 real time.

Arthur Jones
~~Arthur Jones~~
~~Arthur Jones~~

K. E. McMillan
 J. E. McMillan
 J. E. McMillan

W. E. Green
 W. E. Green
 W. E. Green

W. E. Green
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W. E. Green
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W. E. Green
 W. E. Green
 W. E. Green

Marie Louise Rausold
 P. E. Rausold
 E. E. Rausold
 J. P. O'Connor (UAL)

[Handwritten notes:]

J.P. Wilkes LAL
C. Wilkes VAL
- 117 E. 1st - Y
Elmer's Young! Piedmont
~~C. Wilkes~~ AA
C. Wilkes CAL
C. Wilkes EAL
Anne Englewood DIA
D.E. EXMAD. EAL.
L. Mayo EAL
A. Parker and UAL
P.F. Hood EAL
R.T. Hubbard EAL
C. Curving Day EAL
Nash & Meathuff DCA-AA-CATY
Amelle EAL
H.A. Stannard DCA EAL
W.Davis Jones DCA EAL

A.P. Tombliden EAL
S. Waterl AAL
L.A.M.X.X.E EAL
W.D. Kelly UAL
K.K. Smith
J.C. Oley AA
Z. W. so.
Baker Bros. DAL
W.H. Hays UAL
D.W. Cwick UAL
J.J. Belfer AL
G. Ridge AAL
B. Haynes H.S. Ali
D.L. Corcoran EAL
C.O. Sisto EAL
RMaby UAL

2/1/80
signatures
petition
#3

Jace mayer

~~Don Mayfield~~

~~W. S. S. S.~~

Stan Bunch

Mary du Laine

~~Jim G. Hunt~~

J. Anderson

~~John~~

Don Yapan

~~FR Anderson~~

D.K. Beck

J. Sogkine AA

~~Ch. W. D. AA~~

~~W. D. D.~~

Bo Brown

~~Ed. Stutter~~

Gilbert MacLennan

~~Ed. Stutter~~

~~Ed. Stutter~~

R. Harrison UAL

Frederic Wandowski ASK

Bob Frazier U.S. Air

~~Ed. Stutter~~

~~Ed. Stutter~~

CP Housley AA

John G. Whelan

P. H. H. EAL

Ron Dunn EAL

W. S. Adams EAL

R. Smith EAL

PG Angus UAL

~~Ed. Stutter~~

~~Ed. Stutter~~

C. C. Smith EAL

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

Doni Matthews AA

~~Ed. Stutter~~

~~Ed. Stutter~~

il. E. E. EAL

S. Tomlin UAL

N. Williams UAL

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

~~Ed. Stutter~~

Betty Scott U.S. Air

Ralph D. Smith EAL
Elizabeth Thompson USAR
B G Ann UAL
Eugene Beasford USAR
K. E. Behrman UAL
~~Al Boyd~~ UAL
Gene Mearns EAL
Catherine ...
Mary Stacey DEAR
Joseph ...
Howard ...
W. Bennett
Nancy Wickham USAR
Zoe McCall AAL
Vivian Jones E.A.L.
Thelma ... EAL
Glad ... EAL
Laurie AA
Deann
Barbara ...
Celina
Mable ...
J. Parker EAL

L. ...
A. Roberts EAL
H. Madison ... EAL
Iona Lake EAL
R. O. Cramer EAL
Dm ... EAL
All ... EAL

Signatures:

~~Ridgely D Capps~~
Mairiel J. Aisad
~~Horne & Anderson~~
Spencer Umbelini 1965
L. Salubert
W. S. Liggins
N. G. O'Neil
A. H. Ford
Huntley
C. J. Fisser
J. K. Schwartz
J. B. Durham UAL
J. L. Yates
K. E. Charles
E. J. Tamm, Jr.
Mrs. Hindle
Tom Rodeg
Thomas M. Lova
C. W. Schiefel PAZ
E. S. Dyman
B. L. Ham
Jim S. Shuman
Dale A. Long
Sandy Lyons
Karen McFinger
DC Johnson
Allison

Jan Williams
W. C. Williams
J. H. Chandler A
965 VW stolen in Feb.
Parker Williams
Michael D Smith 1978 POLSKA
Notes sent to Co.
Wayne Hagg EAL
Chagnat
A. Grommayer 1967 NW SIMON
D.L.C.
H. Hahlin
W. Winkler
D. Exton
D. L. (van) FA-EAL
TICE SINGH
PFB 1978
EAL
Small EAL
EAL
Berkman on EAL
D. Eileen
F. F. Pierce AAL
M. J. Pierce Ad & C
Jim Bell EAL - died to
stock etc.
Rock Creek
John Leonard ASA
C. J. Wall EAL
Mark Moss

[illegible]

EAL
 EAL
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 LAIR
 US AIR
 AAL
 EAL
 VAL
 215 A/c
 US AIR
 EAL
 U.S. AIR
 PHI
 EAL
 EAL
 EAL
 UAL
 AAL
 ETH
 ANF
 ALLIED
 AAL
 EAL
 AAA
 UAL
 EAL

CAPT FRED T. EPSON	EAL
FO <i>Curley Owen</i> VAL	
F. GUTHRIE	FAA
DW Mayo	
N.G. Hipp	UAL
<i>Frank L. Stallen</i>	"U.S. Air"
<i>Edley</i>	EAL
<i>Edley</i>	EARL
Fred Manderoli	US Air

Jack Thomas	US Air
John	UAL
E. Dyer	UAL
W. W. W. W.	UAL
Samuel K. Jackson	UAL
P. P. P.	UAL
C. C. C.	UAL
J. F. White	UAL
W. W. W.	US Air
M. S. S.	UAL
C. C. C.	EAL
M. G. G.	US Air
J. J. J.	US Air
R. R. R.	UA
JEAN C. APPAL	US AIR
MARCO DA SILVA	US AIR
Thomas L. R. R.	US AIR
Richard P. P.	US AIR
Paul P. P.	EAL
C. C. C.	UAL
J. J. J.	UAL
R. R. R.	UAL
W. W. W.	UAL
R. V. V. (vandalized) (vandalized) VAL	VAL

J.M. Hunt	DEAFO
J.W. Easton	PCFB UAL
R.T. Dwyer	DEAFO UAL
J.E. Dwyer	EAL
P. D. Dwyer	UAL
J.W. Keith	EAL
M.E. Grace	UAL
Z.B. Grace	EAL
M.K. Sauer	EAL
M. R.	EAL
S. M. R.	U.S. AIR
J. J. R.	UAL
L. K. R.	U.S. AIR
T.S. R.	EAL
J. L. R.	AAL
J. R. R.	AAL
J. R. R.	~~AAL~~ UAL
L. S. R.	UAL
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P. R.	U.S. AIR
B. R.	USA
M. R.	"
J. R.	UAL
A. R.	AAL
W. R.	UAL
J. R.	AAL
M. R.	UAL
M. R.	AAL
M. R.	UAL

D F Dalton - EAL

J Adams UAL

E M. Menda US Air

J F. West WH

I L Schultz EAL

J F. Chay UAL

J F. Chay EAL

J F. Chay EAL

J F. Chay EAL

John W. Shelton Tr US Air

J Rowe AAL

B G. Molaski UAL

B G. Molaski UAL

J F. Chay EAL

J F. Chay EAL

J F. Chay EAL

J F. Chay EAL

1. 1. 1. ~~Thompson~~ UAL
 2. McKane UAL
 3. William R. Ferguson UAL
 4. J. J. Johnson USAR
 5. J. J. Johnson USAR
 6. R. Davis UAL
 7. R. Anderson UAL
 8. J. J. Johnson UAL
 9. J. J. Johnson UAL
 10. J. J. Johnson UAL
 11. J. J. Johnson UAL
 12. J. J. Johnson UAL
 13. J. J. Johnson UAL
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 Jane Cunningham EAL
 Joe Davis EAL
 John
 W. Gadsen
 H. E. Jorgensen WAB
 J. J. Wright EAL
 Marybeth Egan
 Barbara Ruffel UAL
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WILLARD G. PLENTL, Jr.
North Carolina

May 28, 1980

JOSEPH G. MASON
Executive Vice President

Mr. David Heymsfeld, Chief Counsel
Aviation Subcommittee
Committee on Public Works and Transportation
2165 Rayburn House Office Building
Washington, D.C. 20515

Dear Mr. Heymsfeld:

NASAO will not request time for the June 11 hearing on the proposed policy for Washington's Metropolitan Airports. We would appreciate it, however, if the following can be accommodated in the Record:

The National Association of State Aviation Officials requests that, in any recommendations or actions taken on operational or other restrictions at Washington National and Dulles Airports, the Committee members be mindful of the precedents that will be conveyed. Airport operators, community representatives, and citizen activist groups nationally look to the way FAA manages "its own" airports in matters of noise abatement, operating hours, aircraft types permitted, etc. It is probable that most of the testimony presented to the Committee will be site specific for the two airports. This should not obscure the fact that these are the only two airports owned and operated by the Federal Government, and that any final rulings, statutes, or regulations will have national importance.

Sincerely,

Joseph G. Mason
Executive Vice President

JGM/jl

HUNTSVILLE-MADISON COUNTY AIRPORT AUTHORITY

P. O. BOX 6006
HUNTSVILLE, ALABAMA 35806

(205) 772-9299

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RICHARD A. TUCKER
CHIEF ACCOUNTANT

June 9, 1980

TESTIMONY

OF

J. E. MITCHELL, JR., EXECUTIVE DIRECTOR
HUNTSVILLE-MADISON COUNTY AIRPORT AUTHORITY
P. O. BOX 6006
HUNTSVILLE, ALABAMA 35806

BEFORE

THE SUBCOMMITTEE ON AVIATION
U. S. HOUSE OF REPRESENTATIVES
GLENN M. ANDERSON, CHAIRMAN

ON

THE DEPARTMENT OF TRANSPORTATION'S
PROPOSED POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

Gentlemen:

The Huntsville-Madison County Airport Authority (Airport Authority) is a public corporation in perpetuity, established and operating pursuant to Act of the Legislature of the State of Alabama. The Airport Authority, inter alia, maintains and operates the Huntsville-Madison County Airport, Huntsville, Alabama, serving the multi-state region of North Central Alabama and South Central Tennessee. The proposed rule making is of great concern to us as we consider ourselves as having grandfather rights to the use of the Washington National Airport. Being within the present 650 mile perimeter rule we continue to have both non-stop and one-stop service. Washington is our number one market, and, by classification, a major market at that.

SUMMARY

Number of Operations - We are opposed to any change to the hourly allocation of operations at the Washington National Airport from the present 40 per hour for air carriers.

Hours of Operation - Proposed hours of operation at Washington National Airport should, at least, be between the hours of 6:00 AM and 10:30 PM.

Page Two
 June 9, 1980
 Testimony of J. E. Mitchell, Jr.
 DOT's Proposed Policy for
 Metropolitan Washington Airports

Wide-Body Aircraft - Two and three-engine wide-body aircraft should be allowed to use the Washington National Airport.

Nonstop Service Restrictions - The existing 650 mile perimeter rule which limits the distance of nonstop flights to and from Washington National Airport should be continued.

IN GENERAL

Number of Operations - To turn Washington National Airport into a general aviation facility and commuter operation constitutes gross mis-use and neglect of a national treasure. We created local service carriers, subsidized them, and now that they have grown up we call them airlines. The Deregulation Act is simply re-inventing the wheel by creating more local service carriers, which we now call commuters, which will have to be even more heavily subsidized, and already are knocking on the door to have the same rights and privileges as the airlines. To reduce scheduled air carrier operations that have the capability to carry more passengers from more places into the Washington National Airport to accommodate commuter operations who can carry only fewer passengers from fewer places, without question, cannot be justified from any level. It is a totally negative approach. As a matter of priority the short and medium range air carrier flights should be accommodated at Washington National, including the one-stops that originate beyond the 650 mile perimeter rule, to the extent the capacity of Washington National will accommodate. Commuter operations should be shifted to Dulles where the operational capacity is available. Investment in high speed ground transportation to the downtown business district of Washington would not only make this utilization of Dulles feasible but also would place Dulles in a more competitive position with respects to Washington National. The proposed rule making, consequently, on operational reductions of air carrier operations at Washington National is totally negative, solves nothing, however, it does create more problems involving more people.

Hours of Operation - The proposed rule making states that, "Carriers would be permitted to schedule operations between 7:00 AM and 9:30 PM". It also states, "The proposed curfew will prohibit all but emergency operations after 10:30 PM and before 7:00 AM". The hours of operation should be scheduled from 6:00 AM to 10:30 PM and individual air carrier operations should be scheduled in order to be accomplished within that stated framework. Emergency operations, of course, would be an exception to the curfew. It could not help but be noted that the proposed reduction in scheduling would eliminate 60 night-time air carrier operating slots, a penalty totally imposed upon the priority and majority users.

Wide-Body Aircraft - Two and three-engine wide-body aircraft should be permitted at Washington National Airport in order to increase capacity

Page Three
 June 9, 1980
 Testimony of J. E. Mitchell, Jr.
 DOT's Proposed Policy for
 Metropolitan Washington Airports

and operational efficiency at little or no cost or inconvenience. Again, this rule should not contain negativism, but should place the responsibility on Washington National Airport management to accommodate these aircraft air-side. The Government needs to impose air carrier operation air-side requirements on themselves to the exact degree they do to others. In that event the wide-body aircraft would have to be accommodated or the Washington Airports would lose their Federal assistance!

Nonstop Service Restrictions - The perimeter rule or restriction while serving a distinct and necessary purpose has already proved that it has nothing to do with making better use of Dulles or BWI. The total and only problem with the latter two locations is simply their accessibility, time-wise, to the downtown business district of Washington. The really long haul flights need to go into Dulles or BWI simply because Washington National Airport, physically, cannot accommodate these type aircraft. This does not mean, however, that commuter or other short haul type aircraft cannot use Dulles. Investment in high speed ground transportation from both Dulles and BWI would change the name of this ballgame overnight and would even attract some of the traffic away from Washington National. Irrespective of this, this nation, today, can no longer afford everything nonstop. Continuation of the present perimeter restrictions, therefore, is an encouragement for longhaul flights to be one-stop, utilizing the perimeter airports to gain access to Washington National. To remove this restriction would impose further demands on Washington National, eroding the grandfather rights of many airports, of which we are one. In all probability it would result in the long-haul flights monopolizing Washington National Airport, resulting in many of the perimeter airports losing their direct service to Washington National Airport completely.

CONCLUSIONS

Generally, the proposed rule making is negative and harmful.

The positive aspects, allowing wide-body aircraft to use Washington National and a reasonable operation period, geared to honest scheduling, should be enacted. The other issues should be excluded.

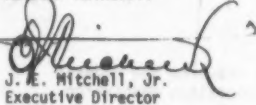
A positive approach to the utilization of Dulles by commuters should be taken. High speed land transportation from Dulles to downtown business district is and has been the major need to make Dulles usable, convenient and competitive. An airport is not an airport just because it is an airport. Dulles certainly proved that. It is high time the Government got on with doing what everyone said should have been done when FAA put Dulles in the boon-docks, build a high speed transport system to connect the airport with Washington. The proposed rule making would either send many of us to the boon-docks or even cause us to lose our service to Washington National. The commuters and latecomers need to be put where the remaining airport accessibility is available. Concentration on improving the

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Metropolitan Washington Airports

utilization of Dulles is the order of the day, not curtailing the utilization and efficiency of Washington National Airport.

Sincerely,

HUNTSVILLE-MADISON COUNTY
AIRPORT AUTHORITY



J. E. Mitchell, Jr.
Executive Director

JEM/pb

D H.
RECEIVED

JUN 17 1980

PUBLIC WORKS AND TRANSPORTATION COMMITTEE

June 9, 1980

David
P. Jones
Phone

JUN 11 1980

ote

The Honorable Harold T. Johnson
Subcommittee on Aviation
Committee on Public Works and Transportation
2165 Rayburn House Office Building
Washington, D.C. 20515

Dear Congressman Johnson:

This is in response to your invitation to present views on the Federal Aviation Administration's Proposed Policy for Metropolitan Washington Airports for your hearing on June 11.

I am writing to you on behalf of the 230 families resident in Mohican Hills, Glen Echo Heights, Montgomery County, Maryland to petition you to "redress the grievances" which we suffer as a result of National Airport traffic. The combination of traffic concentration and the increase in numbers of planes over the past several years has greatly worsened the burden. From the time we are awakened in early morning through the last roar in the late evening, we are bombarded with an almost constant barrage of nerve-jarring noise that greatly disrupts rest, leisure, and socialization - especially in the warm half of the year.

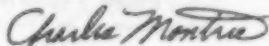
Altogether, this condition makes a mockery of the national attempt to improve environmental conditions in the country and the world. Noise pollution is by far our greatest community problem, yet we have been unable to obtain relief either by application of law or administrative regulation.

We have no arguments to add to the excellent presentation made to the FAA in the document Comments of the Metropolitan Washington Coalition on Airport Problems ("CAP") April 13, 1980. I would only like to remark that one seldom sees so conclusive a case assembled on any issue. It is hard to see how any objective observer would not agree with the CAP analysis. To propose installing a major commercial jet airport in the center of a metropolis of 3 million people obviously would be unthinkable. Surely no other city of comparable size in the world would tolerate continuation of so great a menace and nuisance, much less any of the great capitals of the world. It seems incredible that the capital of the United States should have to suffer this galling annoyance despite all the effort and expense of recent years to improve the amenities and quality of life of this city. Does Washington have to suffer like a nineteenth century mill town?

Clearly, no alternative will suffice to give relief other than a plan to cut National Airport traffic by a half or more, and spread the burden widely over the metropolitan area.

We ask that you use your authority to direct the FAA to prepare and execute the necessary plans to relieve Washington of this absurd and unnecessary burden in the shortest feasible time.

Yours very truly,



Charles Montrie
President
Mohican Hills Citizens Association
6406 Wicasset Rd.
Bethesda, Md. 20016



Austin Chamber of Commerce

901 WEST RIVERSIDE • P.O. BOX 1967 • AUSTIN, TEXAS 78767 • (512) 478-0383
Neal Spolce, President • Ben T. Head, Treasurer • Vic Mathias, Executive Vice President

June 3, 1980

MEMO

TO: Honorable Glenn M. Anderson
Chairman, Subcommittee on Aviation
Public Works & Transportation Committee
U. S. House of Representatives
Washington, D. C. 20515

FROM: William L. Nolen
Chairman, Air Service Committee

Please file the attached statement for the record, in opposition to the detrimental proposed new FIA Washington Airport policy change.

We urge you to oppose and defeat this undesirable proposal.

WLN:dq
Enclosure

c/c: Congressman J. J. (Jake) Pickle

RECEIVED
GLENN M. ANDERSON
MEMBER OF CONGRESS
WASHINGTON OFFICE



Austin Chamber of Commerce

901 WEST RIVERSHIDE • P.O. BOX 1967 • AUSTIN, TEXAS 78767 • (512) 678-0983
 Neal Spelce, President • Ray T. Head, Treasurer • Vic Macklin, Executive Vice President

April 16, 1980

Federal Aviation Administration
 Office of Chief Counsel
 Attn: Rules Docket AGC-24
 800 Independence Avenue, S.W.
 Washington, D. C. 20591

Re: FAA Notice 80-2

Gentlemen:

Austin is among the high number of major national air traffic generators/destinations whose air passengers will be seriously inconvenienced and deterred by the mandated 18% reduction in airline operations at National Airport in Washington which your December, 1979, announcement proposes.

Full utilization of DCA is as vital to South and Southwestern air travellers as it is to Washington-area residents. Probably over 80% of all Austin-Washington and Washington-Austin passengers prefer and use National Airport's close-in location convenience, augmented by the METRO rapid transit system now serving that airport. To compel these taxpaying air patrons by bureaucratic political fiat to involuntarily either forego their journeys or suffer the significant expense and fuel-wasting, time-wasting inconvenience of using undesired distant airports at Dulles or Baltimore is both unconscionable and counter-productive to the national energy-conservation effort.

Austin's air schedules with Washington are highly important to this Texas capital city and its outbound and inbound air travellers. Your proposal would almost certainly result in service reductions and/or eliminations in the busy Austin-Washington air market.

Current National Airport carriers are utilizing ever-improving noise-abatement procedures and equipment, and have already heavily reduced DCA frequencies in recent years while carrying greatly increased passenger totals. WASHINGTON NATIONAL AIRPORT OPERATIONS SHOULD REMAIN AT THEIR PRESENT LEVEL WITHOUT FURTHER CURTAILMENT, OBSTRUCTION, OR THWARTING THE INDIVIDUAL FLYING CITIZENS' LEGITIMATE TRAVEL PATTERN NEEDS. To accomplish that objective for the public benefit, we join the many other cities soliciting and urging your reconsideration and abandonment of the proposed curtailed-operations policies which would unnecessarily negatively impact most Washington air travellers.

Sincerely,

WILLIAM L. MOLEN
 Chairman, Air Service Committee

WLN:dq

c/c: Neal Spelce, President
 c/c: Steve Harris, President-Elect
 c/c: Sam Wilson, VP Transportation
 c/c: Congressman J. J. (Jake) Pickle
 c/c: Senator John Tower
 c/c: Senator Lloyd Bentson

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71301

RICHARD L. CROWELL
RICHARD B. CROWELL
WILLIAM B. OWENS
MICHAEL S. TUDOR

TELEPHONE
445-1430

29 May 1980

Honorable Glenn M. Anderson
Chairman, Sub-Committee on Aviation
Public Works and Transportation Committee
United States House of Representatives
Washington, D. C. 20515

RE: Washington National Airport
Operating Policy

Dear Congressman Anderson:

As Vice-President of Economic Development for the Alexandria-Pineville, Louisiana, Chamber of Commerce, and on behalf of said body, I would like to register our opposition to the proposed reduction in service at Washington National Airport.

With the advent of deregulation of the airline industry, the people in the Alexandria, Louisiana area have seen air service by the scheduled carriers drastically curtailed. At the present time, there is one (1) morning flight and one (1) evening flight from Alexandria to Atlanta, Georgia, from whence one must change planes to continue on to Washington, D. C. Fortunately at the present time one can connect with flights going into National Airport once a change of planes is made in Atlanta, Georgia.

If service into National Airport were curtailed to such an extent that connecting flights in Atlanta, Georgia, could not be timely made in order to arrive at National Airport, then the citizens of this area would be further inconvenienced and delayed. I would like to point out that the Esler Field Regional Airport serves approximately 350,000 people in this area, and the statistics at the airport particularly in light of the curtailed service to the facility indicate that the scheduled flights are tremendously booked on a regular basis. Thus, any curtailment of service at National Airport could and in all probability would have a drastic, adverse effect on the air traveler in the Central Louisiana area.

Honorable Glenn M. Anderson

-2-

29 May 1980

If anything, the citizens in this area would propose increased service to National Airport. On behalf of the Alexandria-Pineville, Louisiana, Chamber of Commerce, we would appreciate your incorporating these views into the record of the proceedings of your sub-committee which we understand will be held commencing June 11, 1980.

Very truly yours,

BY: 

WILLIAM B. OWENS
Vice-President
Economic Development
Alexandria-Pineville Chamber of Commerce

2475 Virginia Ave., N. W.,
Washington, D. C. 20037
June 3, 1980

Committee on Public Works and Transportation,
Subcommittee on Aviation,
U. S. House of Representatives,
Washington, D. C.

Dear Sirs:

This refers to your scheduled hearing, June 11, 1980, on "The Department of Transportation's Proposed Policy for Metropolitan Washington Airports."

I would like to present the following comments in this matter on behalf of the Foggy Bottom Association of Washington, D. C.:

All commercial jets flying out of National Airport to the north pass over or close to the Foggy Bottom area. Because this area is only about 2 1/2 miles from National the planes fly over at still relatively low levels. Thus Foggy Bottom suffers more severely from the noise and pollution than any other neighborhoods in the north flight pattern.

Recently more than 350 Foggy Bottom citizens living in the flight pattern signed a petition to the Metropolitan Washington Council of Governments (MCOG) requesting its support in getting FAA to bring about some relief to this area.

We believe relief can only come through two courses of action, (1) Reduction of flights at National by at least 50%, and (2) adoption of alternative flight patterns, such as a scatter plan, to distribute the impact of the jets as evenly as possible over the entire area. We fully support CAP's position regarding these courses of action.

There have been many protestations over a number of years, and especially the last two years, about the excessive and increasing traffic at National. On the basis of these we had hoped the Department of Transportation would develop a policy that would stop the growth and institute a program to steadily transfer flights from National to Dulles and BWI.

The publicity emanating from Secretary Goldschmidt's announcement of proposed policy gives the impression that the proposal represents a determined effort to reduce National Airport traffic.

Such is not the case.

Beyond a lopping-off of late evening flights - a concept FAA has been proposing for nearly two years - there is no significant cutback in operations, and hence, no reduction in the intolerable noise burden. It will do nothing to make National quieter, safer, or less polluting. It will not result in any transfer of flights from National.

On the contrary, it proposes "limited" future growth from the present 15 million passenger per year to 18 million.

Also the proposal opens up consideration of extending the present non-stop perimeter. Such consideration is unjustified. Furthermore a widening from 650 miles to 1000 miles is conducive to growth - not reduction.

The Secretary has described National as a "dump" and wants it cleaned up. The reason for the chaos and congestion there is mainly due to the gross over-utilization of the airport. FAA admits it is used at 125% of capacity.

Logic should dictate that the traffic should be reduced sharply to the level within the airport's capability prior to effecting modernization and improvements that may be necessary.

The proposed policy may be well-intentioned as a first step and based on commendable objectives. But it is ill-designed to meet such goals. It is merely a token action. In effect, it means "business as usual".

FAA has simply proposed more growth at a slower rate than FAA had previously preferred. A 1978 FAA alternative of a 50% reduction was dropped in 1980 by FAA and replaced by three "growth" alternatives in the Draft Environmental Impact Study (DEIS).

What is needed is a well-defined fixed schedule inaugurated as soon as practical for a phased-in reduction over several years designed to reduce operations at National at least 50%.

In transferring flights from National, the airlines should be able to be certain to keep at National those flights most used by Members of Congress.

The crux of the basic problem in this matter is that FAA is not disposed to make any commitment towards any substantial reduction in traffic at National despite overwhelming and repetitive comment and opinion to the contrary by many local citizens and organizations. FAA appears to want to maintain National as the primary airport in the region (now handling two-thirds of the volume - Dulles and BWI dividing the other third).

All sound reasoning points to the fact that progress and the future needs of the area do not lie in National. It is already grossly over-utilized with limited space and facilities. It has only one runway for jet operations. It is a close-in airport, less than 2 1/2 miles from the heart of the city.

Under these circumstances National should only perform a "short" or "medium" haul role.

Other cities, such as Dallas and Chicago, have long since transferred most all commercial jet traffic from their small, close-in airports (Love Field and Midway, respectively) to their new and larger airports. This despite the fact that they are at a considerable distance from the heart of these cities. If National and Dulles were under a local regional authority it is most likely such action would already have taken place here.

This brings up the matter of administration of the National and Dulles Airports. There is no sound basis for them to be maintained as Federally owned and operated. This is an accident of history. They should be turned over to a regional body like the Port Authority in New York.

Under present circumstances FAA is judge, jury and executor of all matters related to National and Dulles. This is obviously wrong.

Another aspect of the National Airport problem is the need for more equitable distribution of the noise and pollution over the region. For more than a decade, one group of area citizens has had to shoulder the entire burden. The "preferential" and arbitrary flight paths, up and down the river corridor, dump all noise and pollution on those same people over 300 times a day, seven days a week. This is unfair and is not done at any other airport in the U. S.

CAP has recommended to CDO and FAA the testing of alternative flight patterns to be as equitable as possible. Under these, jets would be fanned out over the broadest geographical area for the most even distribution of aircraft consistent with safety.

The goal is to develop alternative flight paths that will bring noise and pollution relief to thousands of area residents, avoiding undue burden on others, and permitting airlines to save hundreds of thousands of gallons of fuel in the process.

FAA is now considering possible alternative flight patterns. A solution to this problem is long overdue.

However, there is at present a prohibited airspace in the D. C. which impedes the participation of the District in such flight plan scattering. This is known as P-36 and P-71 areas - the Mall from the White House and the Capitol. There appears to be no sound basis for this prohibition at the present time. Overtures to remove it have been made to the Executive Office of the President.

It would be ironic and unfortunate if the scatter pattern could not be applied to the ~~NATIONAL~~ District areas. The noise-impacted neighborhoods in the D. C. are the most seriously effected by jets north of National.

Therefore we would like to ask the Subcommittee to recommend to the Executive Office the removal of the above prohibition to the extent necessary to permit flights northward over the mid-point of the Mall. This would assist greatly towards the solution of this serious problem.

Regarding the basic matter of the Transportation Department's proposal, we believe the determination of the final policy is extremely crucial. It will have a most important bearing on the future of air passenger traffic in the region for many years to come. It will set the direction, scope and tone of a number of actions that must be taken. We sincerely hope the Secretary will give careful and balanced consideration to the interests, rights and welfare of all parties concerned.

Your Subcommittee can render a most valuable public service by setting forth your unbiased evaluations and opinions on the proposed policy based on the presentations made to you in connection with this hearing.

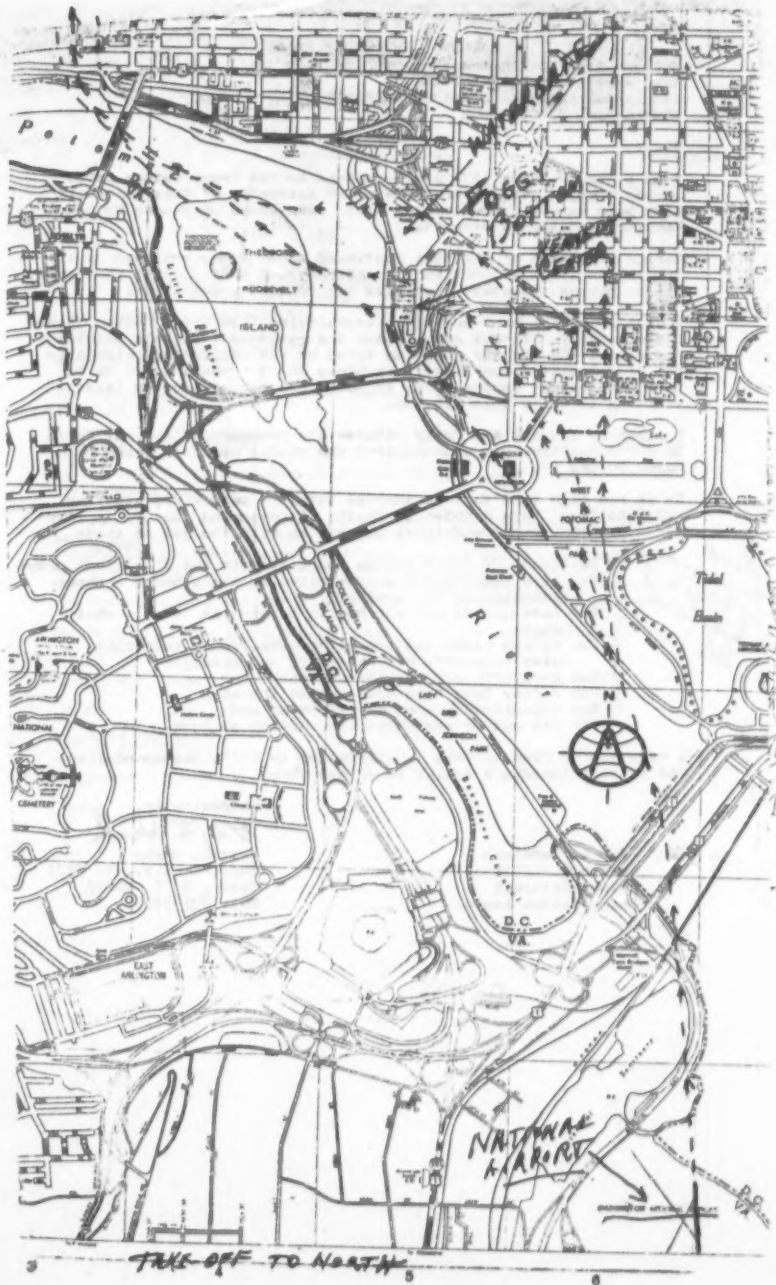
We hope you will make such conclusions available to the Secretary for his consideration in finalizing his policy.

Respectfully yours,

Lawrence A. Phillips
Lawrence A. Phillips

Foggy Bottom Association

Tel. 965-0902



*For info. re Washington Metropolitan
Re: June 11 Hearing*

March 19, 1960

Metropolitan Washington Airport
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, D. C. 20001

copy

Sirs:

I am a twenty-three (23) year resident in the Foggy Bottom Area. During a major portion of these years residents of this community have been harassed by airplane noise occasioned by planes using Washington National Airport.

During a portion of the time mentioned above I was employed by the Federal Aviation Administration and reported this problem many many times; giving objective specifics regarding the condition.

I have worked with my own civic association (the Foggy Bottom Association), many citizens groups, and the government on this problem for years. So far the position taken by the Washington Metropolitan Area Coalition on Airport Problems (CAP) appears to me to be the most logical common sense approach to solving - or at least starting to solve this problem.

I strongly support and fully endorse the recommendations put forth in CAP's position paper announcing the public meetings being held March 20 and 27.

It is now high time that we stopped talking, surveying, studying and "stalling" this problem to death. I recommend that we approve CAP's position recommendations and get on with the job as that:

*Good
expression
of effects of
airplane
noise*

Residents of Foggy Bottom can listen to the 10 o'clock news;
Can have intelligent conversation in their homes without
screaming at one another;
Can have guests without having to explain "what's that
noise";
Can retire early without being waked up by successive
noisy take-offs between 10 PM and midnight;
Can generally get our hearing back; and
Can suffer less from pollution of the air;
Can occasionally open our windows; and
Can sit out on our balconies, patios or lawn.

I urge you to give serious consideration to CAP's recommendations and to take immediate action to effect them.

CC: Eric L. Bernthal
Lawrence Phillips
Alfred Cottrell
Foggy Bottom Assoc.

Respectfully,
W. J. Healy
W. J. Healy
2675 Va. Ave., NW #122
Wash., D. C. 20037
Tel. 337-3076



COMMONWEALTH of VIRGINIA

Department of Aviation
4508 South Laburnum Avenue

June 4, 1980

WILLARD G. FIENZI
Director

RECEIVED P. O. BOX 1771
VIRGINIA 22121
(804) 788-3681

The Honorable Glenn M. Anderson, Chairman
Subcommittee on Aviation, Public Works
and Transportation Committee
Room 2165
Rayburn House Office Building
Washington, D.C. 20515

Re: Subcommittee Hearing on Proposed FAA Policy at Washington National Airport
June 11-12, 1980

Dear Congressman Anderson:

In lieu of oral testimony, we have enclosed five (5) copies of our written and oral comments submitted to the FAA.

While we are very concerned about the long term impact of the proposed policy, we are more concerned about the type of "slot" allocation procedure the FAA requires the airlines to adopt. We believe that any type of procedure other than the current procedure used by the Airline Scheduling Committee will severely impact short-haul service to the most convenient destination terminal for Washington and by far the best connecting terminal in the Washington area.

We ask that you give careful consideration to our comments and submission as you review the proposed policy.

Respectfully yours,

Kenneth G. Fienzi
Kenneth G. Fienzi
Director
Department of Aviation

WGP/mp

Enclosures

866

BEFORE THE
U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C. 20591

COMMENTS OF
DEPARTMENT OF AVIATION
COMMONWEALTH OF VIRGINIA

NOTICE OF PROPOSED RULEMAKING 80-2

Docket No. 19948

NOTICE OF PROPOSED POLICY

Docket No. 19950

Communications with respect to this
document should be sent to:

Willard G. Plentl, Director
Department of Aviation
P. O. Box 7716
Richmond, Virginia 23231
Telephone: (804)786-3685

May 1, 1980

BEFORE THE
U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C. 20591

NOTICE OF PROPOSED RULEMAKING 80-2 Docket No. 19948

NOTICE OF PROPOSED POLICY Docket No. 19950

COMMENTS OF DEPARTMENT OF AVIATION

COMMONWEALTH OF VIRGINIA

On January 15, 1980, the U. S. Department of Transportation and the Federal Aviation Administration (FAA) issued two documents. The first was a Notice of Proposed Policy (NPP) to guide the future operation and development of Washington's two airports (Docket 19950). The second was a Notice of Proposed Rulemaking (NPRM) to implement the policy changes on January 1, 1981 (Docket 19948). The Department of Aviation is submitting these comments on just the NPRM. They are in addition to our oral testimony presented at the Public Hearing held at Washington/Dulles International Airport on March 25, 1980 (copy attached).

The FAA has proposed a 9:30 P.M. to 7:00 A.M. curfew on Washington National Airport for all scheduled operations (14 CFR 159.40). The Department

suggests that the FAA shorten the proposed curfew for commuter carriers so that it would extend from 10:30 P.M. to 6:00 A.M. We suggest that commuter carriers should be able to schedule operations at one-half the hourly allocation proposed in Alternative B (8 per hour - 14 CFR 93.123) during the period from 6:00 A.M. to 6:30 A.M., then from 6:30 A.M. to 7:00 A.M., commuter carriers would be able to schedule operations at the proposed rate of 15 per hour. No air carrier or general aviation operations would be permitted before 7:00 A.M. In the evening, commuter carriers should be able to schedule operations at the rate of 15 per hour from 9:00 P.M. to 10:00 P.M. Between 10:00 P.M. and 10:30 P.M., commuter operations would be reduced to the rate of 8 per hour. Again, no air carrier or general aviation operations except for unscheduled emergencies allowed after 9:30 P.M.

Such a modification in the proposed policy should have minimal environmental impact in that operations will be conducted by aircraft which in general have noise and pollution characteristics significantly less than the majority of present generation jet aircraft. In addition, since the vast majority of commuter passengers are connecting either to or from air carrier flights and since there is a 45 minute "legal" connect time at Washington National for the construction of connecting flights, such a provision in the policy will have a minimal effect on either the land or air side congestion and the resulting pollution levels at National either before 7:00 A.M. or after 9:30 P.M. and should actually help to relieve congestion and reduce pollution levels in the 7:00 A.M. to 8:00 A.M. period and again in the 9:00 P.M. to 9:30 P.M. period.

The Department believes that the FAA is under extreme pressure to adopt a uniform perimeter rule of 1,000 miles. While the Department is opposed to a 1,000 mile rule and reiterates its position favoring a 650 mile rule without the current "grandfather" exemptions, it suggests a method of protecting the short and medium haul role of National Airport, but will also allow limited long haul service.

The Department believes that the FAA should adopt a weighted slot allocation formula based on a multi-perimeter rule for air carriers according to the following table.

<u>Perimeter (Miles)</u>	<u>Scheduled IFR Operations per Hour</u>
0 - 400	20
401 - 700	10
701 - 1,000	6

Such a policy would have many desirable effects. It would mean that over 73% of all IFR operations (44 per hour) would be in short haul markets, almost 17% (10 per hour) would be in medium haul markets, and only 10% (6 per hour) concentrated in long haul markets.^{1/} It would protect and enhance the role of Washington-National as primarily a short and medium haul airport, but would allow limited non-stop service to several communities within 1,000 miles which have been "unjustly" denied service in the past. It would also protect service in short haul markets which are extremely dependent on service to National for both connecting service and direct service to the most convenient destination airport for downtown Washington, D. C. Further, it would help to limit growth at National to the 18,000,000 passenger ceiling proposed in the policy (Notice of Proposed Policy, Docket 19950). Finally, because of the concentration of service in short haul markets, it would have a beneficial impact on noise and pollution levels both at National and in the surrounding communities. This is due to the fact that the greatest concentration of operations would be conducted by aircraft characteristically producing low noise and air pollution levels.

The Department also suggests that commuter carriers should be prohibited from operating more than 300 miles non-stop from Washington National. Ultimately, with National Airport operating at fixed capacity both in terms of ^{1/} Commuter and general aviation operations are counted as short-haul operations.

operations and passengers, longer haul commuter traffic should be fed through a convenient hub with frequent, direct service to Washington. Such a prohibition will help to produce a greater balance in our Air Transportation System in terms of the best use of the capacity limitations at National Airport.

THEREFORE, the Department of Aviation of the Commonwealth of Virginia urges the Federal Aviation Administration to include in Title 14 of the Code of Federal Regulations rules which will allow scheduled commuter operations prior to and subsequent to the curfew proposed in the Notice of Proposed Rulemaking. Further, the Department urges the FAA to adopt a multi-perimeter rule and concurrently allocate slots on a weighted basis to further protect and enhance the role of Washington National Airport as primarily a short and medium haul airport.



COMMONWEALTH of VIRGINIA

Department of Aviation
4508 South Laburnum Avenue

HILLARD S. FLEURY
Director

P. O. BOX 1716
RICHMOND, VIRGINIA 23201
(804) 780-3000

Statement of the Virginia Department
of Aviation on the Proposed Policy
for the Operation of the Metropolitan
Washington Airports.

Mr. Chairman, we would like to thank you for this opportunity to offer our comments on the recently published Supplement to the Draft Environmental Impact Statement (D.E.I.S.) of March, 1978. We praise the Metropolitan Washington Airports Division of the Federal Aviation Administration for the comprehensive document which has evolved. Its publication has come at a time when issues like air transportation, land use planning, energy, and environmental concerns are critical to the future development of the Northern Virginia Region.

It is because of the potential catalytic effects from this policy that we have carefully reviewed the document and have the following comments to offer:

- A) The Department believes that the FAA's proposal to reduce Air Carrier operations to 36 per hour, raise commuter operations to 15 per hour, and lower General Aviation operations to 9 per hour offers a realistic method of controlling passenger growth at National Airport. Increased commuter access will also alleviate the disparity between the demand for and the availability of commuter slots.

best copy available

- B) The FAA's proposal to place a 9:30 PM to 7:00 AM curfew on National for air carrier and commuter operations is perhaps the best method available to both control passenger growth and improve the environment around National Airport. If passenger growth is carefully monitored in the future, the operating curfew can be expanded as wide bodied aircraft are introduced and Air Carrier operations are further reduced.
- C) The Department is extremely concerned about the implication of a 1,000 mile perimeter rule. Today, the average stage length of trunk carriers such as United and Eastern is only slightly more than 650 miles. A 1,000 mile rule will mean that National will become a facility offering all levels of air line service rather than its desired role as a medium and short-haul facility. Further, the SDEIS does not include a comparison between the noise and pollution levels of similar aircraft operating a 150 mile stage length versus a 1,000 mile stage length. Obviously, a comparison would have shown higher noise and pollution levels for at least 50% of the operations involving the longer stage length flights. We also believe that the only way to adequately encourage the greater use of Washington's other airport is to discontinue the exemptions granted to the seven "grandfather" cities. Therefore, the Department believes that the FAA should formally adopt a 650 mile perimeter rule at National without the current exemptions.

D) The Department believes that the final ceiling on passenger growth at National should never exceed 18,000,000 passengers. Therefore, if that ceiling has not been reached by 1985, passenger growth should not be allowed to grow to meet the ceiling, but should remain at the 1985 level.

E) One of the key elements of the FAA Proposed Policy is to shift a significant amount of the current air carrier activity at National Airport to Dulles International. In the past, much of the lack of activity at Dulles International has been attributed to poor surface access and the resultant public decision when given the choice, to use National instead of Dulles International Airport.

We cannot overemphasize the need to rectify this situation, for without a solution, the Proposed Policy will be meaningless rhetoric. One of the prime solutions to the access problem is the rapid completion of the Dulles Access Road Extension and Interstate 66. Although this point is covered on Page III-36 of the supplement, its potential impact on the increased utilization of Dulles International cannot be overstated. The direct link with Interstate 66 will greatly expand the ground service area of the airport and provide for the accessibility from the Washington, D.C. area so critically needed to make this policy work.

The revised November, 1981 completion date of the Dulles Access Road Extension and Interstate 66 by the Virginia Department of Highways and Transportation must

be afforded one of the highest priorities in whatever policy is adopted.

- F) The issue of increased General Aviation utilization at Dulles International is one that we have been closely involved with for the past five years.

The Virginia Air Transportation System Plan published in August 1975 recognized the need for two additional General Aviation Airports in Northern Virginia to be operational by 1990. However, due to financial, environmental, and land use constraints it is highly unlikely those facilities will ever be constructed. In addition, there is the distinct possibility that several privately owned, public use General Aviation Airports in the Metropolitan Washington area will cease to exist because of encroaching development. This leaves us with a peculiar problem; to provide adequate General Aviation capacity with a decrease in the number of airports.

It is because of this, that we again ask for development of a separate General Aviation facility on the Western side of the Dulles International site. The addition of a General Aviation runway, apron, hangars and terminal space would help to meet the urgent General Aviation needs of the region. If at such time in the future that this proposed General Aviation runway be required for air carrier use, it has only to be expanded.

The separate facilities will allow the segregation of slower General Aviation aircraft from the larger and faster Air Carrier types. This would allow Dulles

International to effectively absorb air carrier operations from National and still provide relief for the ever increasing General Aviation demand in Northern Virginia.

In conclusion, we would again like to thank you for this opportunity to offer our comments and praise your efforts in soliciting public input while developing a policy for planned aviation growth in the region.

AIRPORT COMMISSION OF FORSYTH COUNTY

SMITH REYNOLDS AIRPORT
WINSTON-SALEM, N. C. 27105
Telephone (919) 757-6251

1980 MAY 30 11:56

RECEIVED
GLENN M. ANDERSON
MEMBER OF CONGRESS
WASHINGTON OFFICE

May 27, 1980

Honorable Glenn M. Anderson, Chairman
Subcommittee of Aviation
Public Work and Transportation Committee
U. S. House of Representatives
Washington, D. C. 20515

Dear Congressman Anderson:

Please find attached our comments addressed to the FAA by letter on April 9, 1980 concerning our position on proposed Washington National Airport Operating Policy.

Please incorporate our written concerns into the record at the Aviation Subcommittee's oversight hearings on June 11, 1980.

Very truly yours,

William B. Rankin, II A.A.E.
Airport Manager

cc: Mr. Richard James, Director-Route Development,
Piedmont Airlines, Inc.
Congressman Steve Neal

Att.

AIRPORT COMMISSION OF FORSYTH COUNTY

SMITH REYNOLDS AIRPORT
WINSTON SALEM, N. C. 27105



April 9, 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, S. W.
Washington, D. C. 20591

ATTN: Rules Docket AGC - 24
RE: FAA Notice 80-2

Gentlemen:

We have reviewed the above FAA Notice 80-2 (attached) and have reviewed the Air Transport Associations' comments on this notice (attached).

We concur with ATA's comments in opposition to the encumbering restrictions and strongly urge FAA to rescind or ease these slot quotas. We urge a flexible and variable allocation that would recognize the more environmentally sensitive early morning and late evening hours. The majority of the passengers using our facility travel to and from the Washington market and a reduction in slots would have a very negative effect on our overall operation as well as a negative impact on our Washington travelers.

Your considerations of our thoughts will be appreciated.

Sincerely,

William B. Rankin, II A.A.E.
Airport Manager

cc: Mr. Richard James, Director-Route Development,
Piedmont Airlines, Inc.
Congressman Steve Neal

COMMENTS OF THE AIR TRANSPORT ASSOCIATION ON DOCKET
NUMBERS 19948 AND 19950 AND FAA NOTICE NUMBER 80-2

I. THE PROPOSALS

FAA is proposing changes to its operating policy at Washington National Airport. Concomitant changes are being proposed in two Federal Aviation Regulations (FAR); i. e., Part 159 which concerns Washington National and Dulles International Airports as well as Part 93 known as the High Density Traffic Airport rule.

Essentially, FAA is proposing an amendment to Part 159 which would lift the prohibition against operations of two and three engine wide-body aircraft at Washington National Airport and establish a so-called perimeter rule governing the non-stop stage length of flights to and from National Airport. FAA is also proposing a policy which would place a ceiling on the number of passengers served annually at National Airport.

Part 93 would be amended to shorten the scheduled operating hours and reduce the number of permissible hourly slots for certificated carriers. The number of slots removed from the certificated carrier quota would be transferred to the commuter quota, which would be redefined in terms of the capacity of the aircraft to be operated.

II. THE AIRLINE POSITION

Some of these proposals have merit; some do not. Others require substantial modification if they are to be adopted.

A. Deregulation and the High Density Traffic Airport Rule

In our submissions to FAA when the High Density Traffic

Airport rule was being considered in 1968 we deplored resort to the regressive concept of government imposed limits on aircraft operations, even as an expediency. We noted our fear that a solution based on restraints would divert attention from the basic problem--i. e., undercapacity--in both airport and airway systems.

Experience confirms that our concern was justified. Little has been done in the last ten years to assure that airport and airway capacity keep up with public demand for airline services. Moreover, FAA has found it comfortable to leave the quotas at the high density traffic airports unchanged during this time notwithstanding the improvements that have been made in the system. Ironically, this may be due in part to the success of the scheduling committees in adjusting to the existing quotas.

In any event, we submit that ten years of artificially stunted growth at four major airports, including National Airport, are enough --that the time has come to free all four airports from these unnatural restrictions. At the very least, this experience calls into question the value of regulatory insinuation into what is essentially a problem to be solved in the marketplace, as is the case at all other airports in the United States. Standing alone this experience justifies rescinding or, at the very least, easing the existing limitations.

We submit that the decision of Congress in 1978 to deregulate the airline industry emphasized the need for unrestricted access to the Nation's airports. By adopting the Deregulation Act, Congress and the President elected to let the marketplace decide the level of service to be provided at a given airport and to choose which carriers would provide it. Deregulation contemplates that some carriers serving specific airports will discontinue or reduce service at some of these airports, and that in some cases those services will be picked up by other carriers, many of them commuter carriers. It is difficult to see how deregulation can work if access to four important airports is encumbered by restrictions such as those imposed by the High Density Traffic Airport rule, no matter who imposes them.

B. Quotas and Hours of Operations--Certificated Air Carriers

The High Density Traffic Airport rule did not predicate the 60 operations per hour at Washington National Airport on environmental concerns. The Instant Notice, however, refers to aircraft noise as a reason for the proposed reductions in the certificated air carrier quota and the proposal to shorten the hours during which flights may be scheduled and operated. Specifically, FAA's proposal would reduce the air carrier quota from 40 per hour to 36 per hour from 7:00 a.m. through 8:59 p.m. It would limit to 18 the number of schedules between 9:00 p.m. and 9:30 p.m., after which time no flights could be scheduled into or out of National Airport. It would also close the airport to all operations after 10:30 p.m. except in emergencies.

We recognize the importance of making the airport a good neighbor as well as a servant of the Nation's travel and commercial needs. On the other hand, no convincing showing has been made that the proposed operational changes will provide sufficient environmental improvements to justify the deleterious impact on commercial activity and impingement on public service that would result should the proposal be adopted. Nor, in our view, does it follow that rescission or easing of the quotas would spawn additional operations in such numbers as to make the environmental impact unbearable. Such an outcome, we submit, is unlikely in the era of spiraling fuel costs in particular, and overall operating costs, in general. Moreover, lifting the prohibition on the operation of two and three engine wide-body aircraft, the noise characteristics of which are less objectionable, must count as an environmental plus.

Nevertheless, if FAA is unwilling to rescind or ease the quotas at National Airport and, persists in an adjustment of the number of air carrier operations for environmental reasons, we submit that, in the practical sense, more meaningful noise relief is achievable, with fewer disruptions in the Nation's air transport system, through a carefully restructured rule that would permit a greater number of air carrier operations during those hours when the ambient noise level is high and reduce them when it is low. In many cases this will work to the mutual advantage of the airport's neighbors and its users.

As just stated, the certificated airlines believe that reducing the quota from 40 an hour to 36 with 16 scheduled operations permitted between 9:00 p.m. and 9:30 p.m., is the wrong way to obtain practical noise relief. A flexible and variable allocation of slots is preferable. Such a restructuring can be accomplished without exceeding the total of 80 operations per hour. Moreover, it would recognize the more environmentally sensitive early morning and late evening hours, particularly on Saturdays and Sundays. The following table (Table 1) sets forth our suggested revision of the quotas:

TABLE 1

ATA SLOT ALLOCATION PROPOSAL

Mon-Fri	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	34	44	44	44	38	38	44	44	44	44	44	44	44	44	38	1/ 618
Commuter	14	12	12	12	12	12	12	12	12	12	12	12	12	12	12	183
Gen. Aviation	12	4	4	4	12	12	12	4	4	4	4	4	4	4	12	100
Total	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	900

Saturday	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	32	40	40	40	36	36	36	40	40	40	32	32	30	30	30	2/ 534
Commuter	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	120
Gen. Aviation	10	4	4	4	8	8	8	4	4	4	4	4	4	4	4	78
Total	50	52	52	52	52	52	52	52	52	52	44	44	44	44	44	732

<u>Sunday</u>	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	28	34	34	36	36	36	36	44	44	44	44	44	44	36	3/	584
Commuter	8	8	8	8	12	12	12	12	12	12	12	12	12	12	12	164
Gen. Aviation	10	4	4	4	12	12	12	4	4	4	4	4	4	4	12	98
Total	46	46	46	48	60	60	60	60	60	60	60	60	60	60	60	846

	Current Allocation	ATA Proposal	FAA (1)	FAA (2)
Air Carrier	4,480	4,216	3,854	3,654
Commuter	896	1,186	1,218	1,526
Gen. Aviation	1,344	876	1,218	910
Total	6,720	6,278	6,090	6,090

1/ 18 operations 9:00 p.m. to 9:29 p.m., 18 operations 9:30 p.m. to 9:59 p.m.

2/ 15 operations 9:00 p.m. to 9:29 p.m., 15 operations 9:30 p.m. to 9:59 p.m.

3/ 18 operations 9:00 p.m. to 9:29 p.m., 18 operations 9:30 p.m. to 9:59 p.m.

As revealed by Table I our proposal results in fewer weekly operations than proposed by FAA^{4/}. That Table proposes a significant reduction in certificated carrier operations and provides for a substantial increase for the commuters. We recognize that it appears more complicated than the current rule, however, its advantages, both operationally and environmentally, outweigh any benefit deriving from simplicity of structure. For example, it recognizes FAA's objective of curbing the overall increase in the number of air carrier operations at National Airport and its perceived need to meet some of the environmental complaints. At the same time, it takes into account the importance of National Airport to the commerce of this area and its role as a vital transportation link to the seat of the Federal Government.

If our proposal is adopted, there will be no good reason to consider the more extreme measure of forbidding scheduled operations after 9:30 p.m. and closing the airport at 10:30 p.m. As previously stated, our proposal accepts a reduction of four certificated carrier slots, from 40 to 36 during that hour. It also would divide the 36 slots equally in half hour increments. Moreover, by permitting no scheduling after 9:59 p.m. it would eliminate the possibility of up to 40 operations being scheduled exactly at 10:00 p.m. as the FAA proposal would do.

^{4/} 6,720 weekly slots are currently available for all users of National Airport. Air carriers are allocated a maximum of 4,480 slots. Commuters are allowed 896 slots. The general aviation share is 1,344 slots.

Our proposal would also increase the commuter slots during the last operating hour to 12 which is more than proposed by FAA. Our proposal avoids the waste of a valuable resource which can be used for public service.

The airline proposal entails even further reductions on the weekends, both during the morning and evening hours. Although the air carrier operations would range from 30 to 40 per hour through the day on Saturday, none of the hours would exceed 52 operations by all classes of users. On Sunday, the total number of daily, and the total number of air carrier slots will be reduced significantly from the weekday levels. This is especially true in the morning hours.

Table I reflects that the general aviation quota would also be reduced both during the week and on weekends. In most instances, this reduction would be added to the commuter quota. At first glance our proposal on the general aviation quota might appear harsh. However, it is in keeping with what we take to be the generally accepted belief that any scarce resource should be allocated with a view of achieving the most efficient and public oriented use of that resource. In this connection, the relative efficiency of general aviation use of the airport and airway facilities as compared with the certificated air carrier and commuter use, is illustrated by comparing the respective passengers per operation carried by the certificated carriers, commuters and general aviation at National Airport. Table II makes this comparison for the period 1974 through 1979.

TABLE II

Calendar Year 1974 ^{5/}

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{6/}
Air Carrier	11,197,116	95.7%	202,759	64.9%	55.2
Commuter	337,854	2.9%	34,591	11.1%	9.8
Gen. Aviation	171,058	1.5%	74,866	23.0%	2.3
Total	11,706,028	100%	312,216	100%	---

Calendar Year 1979

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{6/}
Air Carrier	14,277,825	84.3%	207,112	58.7%	68.9
Commuter	632,567	4.2%	46,594	13.8%	13.0
Gen. Aviation	233,614	1.5%	97,198	27.5%	2.3
Total	15,135,017	100%	352,904	100%	---

The greater efficiency of use by certificated and commuter carriers becomes even more dramatic when a longer period (1972 through 1979) is analyzed. Table III makes those comparisons.

TABLE III

Calendar Year 1972

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{6/}
Air Carrier	10,689,961	86.1%	218,984	66.1%	48.8
Commuter	250,002	2.3%	30,746	9.3%	8.1
Gen. Aviation	163,002	1.6%	81,699	24.6%	2.3
Total	11,121,965	100%	331,429	100%	---

Calendar Year 1979

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation ^{6/}
Air Carrier	14,277,825	84.3%	207,112	58.7%	68.9
Commuter	632,567	4.2%	46,594	13.8%	13.0
Gen. Aviation	233,614	1.5%	97,198	27.5%	2.3
Total	15,135,017	100%	352,904	100%	---

^{5/} Aircraft operations generally were lower in 1974 due to the fuel crisis.

^{6/} In the case of general aviation, crews are included in the passenger count. That is not the case with air carriers and commuters.

The reductions we are proposing in general aviation operations would not reduce the percentage of slots available to that category below the percentage historically assigned by the High Density Traffic Airport rule at LaGuardia, an airport comparable in many ways to National Airport. Furthermore, the quotas tend to be absolute operational limitations for the certificated carriers and commuters who must operate on a schedule. On the other hand, general aviation is in a more flexible position since they are not bound in IFR weather to operate on a schedule. As FAA well knows most general aviation aircraft requesting access to National Airport in VFR conditions have been accommodated. Illustrative of this point is the fact that while general aviation's quota represents 20 per cent of the hourly slots, during 1979 general aviation activity accounted for 27 per cent of all operations at National Airport. Virtually all of these operations occurred during the quota hours.

C. Annual Passenger Limit

As pointed out above in discussing deregulation and the High Density Traffic Airport rule, the airlines believe that any artificial restraint on utilization of airports and airways is conceptually abhorrent. This is just as true of proposed annual limits on the number of passengers at National Airport as it is of restrictions on the number of operations. Such a proposal, therefore, should be forthrightly rejected.

If, however, the 18 million total annual passenger figure proposed for National Airport is for planning purposes in connection with

the development of a master plan, the airlines believe that any planning figure should only apply to passengers originating or terminating at that airport. Those passengers who are merely changing airplanes at National Airport do not leave the terminal building complex. They have no impact on the roadways, public parking lots, or curbside facilities. The aforementioned elements of the groundside facilities, rather than terminal buildings, are the ones most commonly cited as the areas of greatest congestion. Therefore, it does not appear reasonable to include connecting passengers in any total for planning purposes.

Additionally, the airlines do not believe that the FAA takes appropriate recognition of the increased use of the Metro rail system by passengers travelling in and out of National Airport. By the end of 1979, approximately 15 per cent of the passengers using the airport arrived or departed by means of Metro rail. As the Metro rail system is extended, and the costs of gasoline and other forms of ground transportation increase, there is no question that this percentage will increase markedly. These passengers, like connecting passengers, have minimal impact on the groundside areas at National Airport. These factors must be taken into account when reaching a final decision as to the ultimate number of passengers to be included in the planning figure.

D. Redefinition of Commuter Aircraft¹

Of the categories of quotas established by FAA two of them, certificated carriers and scheduled air taxis, refer to the economic

operating authority of those carriers. The "Other" category includes all general aviation operators.

The airlines believe that this change would be useful and support the proposal to redefine any transport category aircraft with less than 56 seats as a commuter for slot purposes, and to place such aircraft in the commuter quota category. However, we would like to stress that it is important that this definition be periodically re-examined and changed when need be to reflect future changes in commuter aircraft size and configuration.

E. Two and Three Engine Wide-Body Aircraft

As mentioned above, FAA has restricted jet operations at National Airport to aircraft no larger than the B-727-200 model aircraft. It now proposes to change this policy and to permit operations of two and three engine wide-body aircraft.

The airlines endorse the FAA proposal that two and three engine wide-body aircraft be permitted at National Airport provided the airlines demonstrate the ability of these aircraft to operate into and out of the airport, and the capability of the airport to accommodate such aircraft.

F. Perimeter Rule

The airlines serving National Airport are not of a single view concerning the non-stop perimeter rule proposed for that airport. The majority are opposed to any limit; however, in the event a limit is to be established, of that majority 11 would favor the 1,000 mile alternative.

These carrier members prefer maintaining the current operating policy restricting non-stop flights to 650 miles with the exception of the seven "grandfather cities" within 1,000 miles of the airport.

III. CONCLUSIONS

These comments are filed on behalf of Air Florida, American Airlines, Braniff International, Delta Air Lines, Eastern Air Lines, Midway Airlines, Northwest Airlines, Ozark Air Lines, Pan American World Airways, Piedmont Airlines, Republic Airlines, Trans World Airlines, United Airlines, USAir, and Western Airlines. They reflect the position of the airlines that the goals of national air transportation policy should be to provide the necessary airport and airway capacity to respond to valid public demand for service under airline deregulation, and to permit necessary scheduling flexibility to meet that demand. This is the case today at all but four U. S. airports, including Washington National. It should be the goal for all airports serving the public.

Washington National Airport is the most appropriately named airport in the United States. Its importance as the gateway to the Nation's Capital extends far beyond the Washington metropolitan area. It is a vital link in the Nation's air transport system meeting the demand of millions of citizens both here and throughout all parts of our country.

Under these circumstances, we urge that every effort be made to eliminate or ease restrictions at the Nation's airports including Washington National. In cases where restrictions are maintained they should be a rational response to the problem presented and reflect the need to maximize opportunities to meet public transportation demands.

We respectfully request FAA in acting on the above captioned proposals to adopt the recommendations set forth above.

May 30, 1980



Honorable Glenn M. Anderson
Chairman, Subcommittee on Aviation
Public Works and Transportation Committee
U. S. House of Representatives
Washington, DC 20515

Dear Congressman Anderson:

The Lehigh-Northampton Airport Authority which operates the Allentown-Bethlehem-Easton Airport in Allentown, PA would like to go on record in regards to the Notice of Proposed Rule Making which was published in the Federal Register, dated Monday, January 21, 1980 which concerns the Metropolitan Washington Airports.

We are opposed to the curfew and/or time use restrictions being proposed for Washington National Airport.

Our Nation's capital is the heart of our country from which is promulgated numerous precedent setting foundations and findings. As an airport operator, we feel that all eyes are on our Nation's capital, thus providing a vehicle for outside communities to follow in the footsteps of our country's central decision point.

In regards to the amendment which would permit wide-body aircraft operations at Washington National, we are in agreement with the position to permit wide-body aircraft operations for the following reasons:

1. Wide-body aircraft can haul more passengers with less aircraft operations.
2. The wide-body aircraft are equipped with high technology engines which will produce less noise than the conventional 2 and 3 engine aircraft currently utilizing the National Airport.

In closing, we thank you for the opportunity to express our views on this matter.

Sincerely,

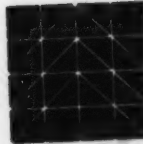
LEHIGH-NORTHAMPTON
AIRPORT AUTHORITY

Robert Rockmaker, A.A.E.
Assistant to the Manager

cc: Congressman Don Ritter

LEHIGH-NORTHAMPTON AIRPORT AUTHORITY
Sponsored by Counties of Lehigh and Northampton
Lehigh Valley, Pennsylvania 18103
(215) 264-2831

RICHARD G. SCHOON
Executive Vice President



The Greater Providence Chamber of Commerce
10 Dorrance Street, Providence, Rhode Island 02903, Telephone (401) 521-5000

June 6, 1980

The Honorable Glenn M. Anderson
Chairman
Subcommittee on Aviation
Public Works and Transportation Committee
U. S. House of Representatives
Washington, DC 20515

Dear Congressman Anderson:

Enclosed you will find a copy of the statement of the Greater Providence Chamber of Commerce which was submitted to our Congressional delegation and the Federal Aviation Administration on the proposed reduction in operations at Washington National Airport.

I am sure that we will not be able to attend the Committee hearing on Tuesday, but I believe this statement clearly reflects our views on the subject. We hope that you will consider our position as you deliberate the question.

Sincerely,

Richard G. Schoon
Richard G. Schoon

RGS:kh
Enclosure

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COMMENTS
OF THE
GREATER PROVIDENCE CHAMBER OF COMMERCE
ON
DOCKET NUMBERS 19948 AND 19950
AND
F.A.A. NOTICE NUMBER 80-2

APRIL 9, 1980

The Greater Providence Chamber of Commerce is concerned about the proposed changes in the operating policy at Washington National Airport.

Reduction of Air Carrier Operations

Washington National is Providence's second ranking origin and destination point and is a major transfer point for that area of the nation between Washington, D.C. and Atlanta, Georgia, which is essential to the Rhode Island textile industry.

We would first like to comment about the quotas and hours of operation which we feel are restrictive and unfair to a medium-hub market similar to Providence, R.I., within 500 miles of Washington. By reducing air carrier quotas from 40 per hour to 36 per hour, Providence stands to be under greater risk to lose service than do larger markets. We feel that the plan, as presented, does not meet the needs of the traveling public during the normal business week or the needs of the residents who are affected by noise from the airport operation, and that the proposal submitted by the Air Transport Association does more nearly meet those needs.

The proposal to severely curtail operations after 9 p.m. will affect 22% of our current service in and out of Washington. Couple that with the reduced hourly quotas, and Providence could conceivably lose 40% of existing service. A majority of our travel between Washington and Providence is business travel, and a potential reduction of this magnitude is unacceptable.

Wide Body Aircraft

The Greater Providence Chamber of Commerce is supportive of the proposal to allow wide bodied aircraft into Washington National. We see it as a means of increasing seats in the major markets and not increasing operations utilizing a quieter aircraft. In fact, we would support the concept that current seats, rather than number of operations, in a market should be considered as a means of reducing operations or stabilizing them; Example: If there were 4 flights between Point A and National Airport, each flight with an aircraft of 100 seats, and the airline placed a 200-seat wide body aircraft in service, then one of the 100-seat flights could be eliminated, maintaining the same number of seats in the market, while reducing the total number of operations by 25%. While this is a simplistic approach, it is an approach which could allow for increased seats and reduction of operations. However, it first must be established if the wide body equipment can operate into National safely and efficiently.

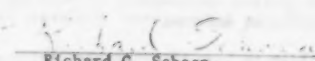
Perimeter Rule

It is the feeling that any reductions of operations, if necessary, should come from those grandfathered cities out of the 650 mile perimeter, and especially those communities being served in Florida, three of which are within a very close proximity to each other and obviously generating a vast majority of their traffic because of vacation and holiday traffic generated out of the Washington, D.C. metropolitan area as a convenience to the citizens of Washington -- the very ones who are complaining most vocally about noise associated with National Airport.

We respectfully request the F.A.A. to consider our views and recommendations as we have stated them.

Please address all correspondence concerning this docket to the following address:

Mr. Richard G. Schoon
Executive Vice President
Greater Providence Chamber of Commerce
10 Dorrance Street
Providence, RI 02903


Richard G. Schoon

RGS:kh
4/9/80

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950 MAY 28 PM 3:01

RECEIVED
GLENN F. ANDERSON
U. S. HOUSE OF REPRESENTATIVES
WASHINGTON, D. C. 20515

JACKSON CHAMBER OF COMMERCE

P O BOX 32548 • JACKSON, MISSISSIPPI 39208 • PHONE 601/848-7576

May 26, 1980

Honorable Glenn Anderson, Chairman
Subcommittee on Aviation
Public Works and Transportation Committee
U. S. House of Representatives
Washington, D. C. 20515

Dear Congressman Anderson:

We would like to have the attached statement incorporated in the record concerning Washington National Airport Operating Policy.

Yours truly,

Lewis Slater, Manager
Research Department

LS/ch



JACKSON CHAMBER OF COMMERCE

P O BOX 32548 • JACKSON, MISSISSIPPI 39205 • PHONE 601/948-7575

April 11, 1980

Federal Aviation Administration
Office of Chief Counsel
800 Independence Avenue, S. W.
Washington, D. C. 20591

Gentlemen:

We have just been advised that the FAA is proposing policy for operations at Washington National Airport that would result in the following:

1. Prohibit the scheduling of any flights after 9:30 p.m. (now 10:00 p.m.)
2. Prohibit any operations after 10:30 p.m. (no limit now)
3. Reduce the number of daily "slots" available for scheduled carriers by 18% (from 650 to 532)
4. Impose limits on future annual passenger enplanements

At the present time, Washington is Jackson's 7th largest air passenger destination city with a 1978 origin and destination count of 28,650. Most of these passengers fly in and out of Washington National Airport, which is very conveniently located for easy access to most downtown areas. Diverting much of this traffic to Baltimore and to Dulles International will be a great inconvenience to Jackson travelers and to travelers from other cities.

As additional policy concerning this matter is developed, we certainly hope that consideration will be given to the viewpoint of the traveling public.

Yours truly,

Leland H. Speed, Chairman
Air Transportation Task Force

LEE:hh

Roanoke Valley Chamber of Commerce
14 West Hill Avenue
Roanoke, Virginia 24011

JACK C. SMITH
 EXECUTIVE VICE-PRESIDENT

June 2, 1980

The Honorable Glenn M. Anderson
 Chairman
 Subcommittee on Aviation
 Public Works and Transportation Committee
 House of Representatives
 Washington, D. C. 20515

Dear Mr. Anderson:

We are greatly disturbed by the FAA proposal to reduce the slots available at Washington National Airport by 18% and by it simultaneously proposing additional policies which will increase the amount of service in big long-haul markets by making new big cities eligible for Washington National Service.

Service to Washington National is of critical importance to Roanoke. It is used by 315 passengers a day. Over half of these use connecting services which are not readily available at the other Washington area airports. Any reduction in slots for Roanoke service will have very serious consequences for Roanoke and for the 700,000 people who live within a 50-mile radius of the city.

Even if the total slots are reduced, the FAA should take no steps which would in any way reduce short-haul service to Washington National. Washington National should be the short-haul airport for the Nation's Capital.

Sincerely,

Jack C. Smith
 JACK C. SMITH, CHAIRMAN
 CITY OF ROANOKE AIRPORT
 ADVISORY COMMISSION

JCS:mb

STATEMENT OF
HON. NEWTON I. STEERS, JR.
ON
THE DEPARTMENT OF TRANSPORTATION'S PROPOSED WASHINGTON AIRPORT POLICY
BEFORE
THE SUBCOMMITTEE ON AVIATION
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

Mr. Chairman and members of the subcommittee, I thank you for permitting me to voice my strong and heartfelt opinion on the matter of noise and traffic limitations for National Airport and the resulting increased utilization of the Washington area's two other major airports, Dulles and Baltimore-Washington International (BWI).

Having lived in Bethesda, Maryland, and having represented Montgomery County's citizens as both a State Senator and United States Congressman, I have become well aware over the past twenty years of local concern over the environmental impact of National Airport's air traffic. This concern, ignored in the past, has finally been recognized in the recent Department of Transportation proposal to limit or divert the air traffic at National.

This proposal, with perhaps a few minor amendments, must be adopted. Montgomery County citizens, as well as those of other counties and districts affected by the constant barrage of jet engines overhead, have put up with bureaucratic delay and lack of Government action for far too long. Now that the opportunity is at hand to regulate this harmful and burdensome situation, let us take appropriate action.

As I understand it, there are two different questions raised by the DOT proposal. The first deals with reduction of noise from individual aircraft; the second with shift of planes away from National Airport to the other, under-used facilities, Dulles and BWI. A sound and far-sighted resolution of both problems is vitally important to all citizens and air passengers.

Following are a number of alarming statistics which, when related to the proposal under study, reflect the disquieting imbalance between the three airports in terms of planning and utilization of existing opportunities in both passenger convenience and potential business markets. This imbalance, if adjusted,

will be a key step in solving both the noise and overcrowding questions.

TABLE 1

(Figures are for number of passengers, in millions)

	<u>Capacity</u>	<u>Usage</u>	<u>Percent of capacity</u>
National	12	15	125%
Dulles	7	3	43%
BWI	11	4	36%
	30	22	73%

To highlight these distressing proportions, consider the facts that Dulles can handle roughly 7 million passengers, twice what it served in 1979, and BWI can handle 11 million, almost triple its 1979 total of just under four million. National Airport, on the other hand, is operating at about 125 per cent of capacity, causing numerous flight delays, traffic congestion for passengers arriving by automobile, and increased problems in processing luggage. According to the May 1980 Council of Governments report, National handled 15 million passengers, more than twice the number of Dulles and BWI combined. To increase the passenger flow ceiling, as has been proposed, would be a grave error. Such a move would magnify the existing overflow conditions in both traffic and noise, and would cause an even greater discomfort to the public than at present.

The individual aircraft noise problem, as well, has long been overlooked and must be rectified. I know from personal experience, as both a concerned citizen and from my efforts in Congress, that F.A.A. and other Government agencies are hesitant, due to pressure from the industry, to take any decisive action on this problem, and have gone so far as to ignore repeated inquiries of concern from interest groups. Even legislative action pertaining to the noise situation has received little attention. To further scorn local residents, Congress recently delayed F.A.A. regulation thirty-six, which specifies a limit of permissible decibels for take-offs and landings, to be reached through study and development by 1983.

The needs, not just wants, of citizens in noise-affected regions must not be ignored. Is it worth the ten minutes of convenience in ground transportation

to downtown Washington to have property damage and increased birth defects (as have been pointed out by State Senator Howard Denis (MI) from the incessant thundering of overhead jet engines? Perhaps so, to the temporary citizens of Capitol Hill, whose families and property are far away from the situation. But, speaking for those who wake up to rattling windows and dishes, my answer is a firm NO.

We must implement such proposals as revised flight paths, stricter curfews, reduction in the overall number of passengers and flights at National, and look seriously into ideas such as the use of quieter, wide-body aircraft, and research into modification of the existing planes using National. Even more important, though, is the increased and more effective utilization of Dulles and BWI as alternatives to National, which in fact is part of the reason for some of the measures proposed above. The figures mentioned show the inadequate passenger and operation totals at Dulles and BWI, and the overload at National.

Contrary to some current beliefs, a slowdown at and shift of emphasis away from National Airport would not mean less "business" for the Nation's Capital. Quite to the contrary, it would mean a more balanced spread between the facilities serving Washington, and would allow far more visitors to the Washington area. Moreover, such a shift would force an improvement in mass transportation services to the two other airports, an area which has received little attention until recently.

We need to see more services like the imminent AMTRAK Union Station-BWI shuttle. We need to see a Metro station opened at Dulles. We need more frequent schedules of other modes of ground transportation to and from the two airports. Obviously, proposals such as those just mentioned involve time and money. But the question here is: How long can we, the citizens of the Washington area, put up with acute discomfort and "irritating" inefficiency on the ground? National Airport, as one Representative has stated, is "an accident waiting to happen." We must revise the current system, and do it promptly before that accident happens.



STATEMENT OF DAVID S. STEPLER, CHAIRMAN, GOVERNMENT AFFAIRS COMMITTEE OF THE BOARD OF DIRECTORS, AIRLINE PASSENGERS ASSOCIATION, INC., BEFORE THE SUBCOMMITTEE ON AVIATION, COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION, UNITED STATES HOUSE OF REPRESENTATIVES HEARINGS ON THE FEDERAL AVIATION ADMINISTRATION'S PROPOSED POLICY ON METROPOLITAN WASHINGTON AIRPORTS

The Airline Passengers Association, Inc. ("APA"), as the representative of over 80,000 frequent airline passengers is pleased to submit this testimony to the House Aviation Subcommittee on the Federal Aviation Administration's Proposed Metropolitan Washington Airports Policy Statement. APA members are frequently flying into and out of the two Metropolitan Washington Airports and therefore are an excellent source for the airline passengers' perspective of proposed changes in the use of these airports. In addition, APA maintains an office in Washington, D.C. and employees and representatives of APA are residents of the Washington metropolitan area and their views have been taken into consideration for this testimony.

APA is aware that the high utilization of Washington National Airport by noisy jet aircraft has created a substantial problem for the residents of the area, located near that airport. APA therefore feels that it is in the best interests of both the local residents of the Washington metropolitan area and airline passengers who utilize these airport facilities, to reach a consensus concerning continued development of airports in the region. APA has concluded that the four alternative FAA proposed policies will not solve the problems of local residents or of airline passengers. APA has proposed an alternative policy for National Airport.

Suite 300 • 1919 Pennsylvania Ave. N.W., Washington, D.C. 20006 • 202-293-3895 • Telex 69-414

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SUMMARY OF APA PROPOSED NATIONAL AIRPORT POLICY

The Airline Passengers Association, Inc. proposes the following policy for National Airport which should satisfy most of the needs of local residents and airline passengers:

1. Perimeter

Eliminate any perimeter restriction, thereby allowing non-stop flights to any point within the operating range of aircraft permitted to serve Washington National Airport.

2. Aircraft Limitations

Current two and three-engine wide-body aircraft would be permitted in addition to those aircraft now allowed. New aircraft such as the Boeing 767 and 757, and the Airbus A310 should also be permitted when available.

3. Slot Allocation

Air carrier - 32 "schedules" per hour, plus extra sections, (a reduction of 20% in available slots); Commuters - 15 "schedules" per hour (an 87½% increase); General Aviation - 9 per hour (a 28% decrease). Slots are reduced by 50% from 9:00 - 9:30 p.m. Slots should be allocated on a financial auction or bidding basis. Slots not used during any hour for six months are permanently lost.

4. Operating Hours

7:00 a.m. until 10:30 p.m. Closed to all traffic except emergencies, 10:30 p.m. until 6:59 a.m.

5. Scheduling Hours

Scheduling hours for air carriers and commuters 7:00 a.m. until 9:30 p.m.

6. Passenger Limit

No annual total passenger limit at National Airport.

RATIONALE FOR APA'S NATIONAL AIRPORT POLICY

It appears to APA that the primary goal of a revised policy for National Airport is to restrict the number of noisy, jet aircraft operating to and from that airport. The noise problem is the primary problem for the airport and must be resolved. Landside problems are not as critical and can be solved after the immediate noise problem is taken care of. APA's proposed policy is the policy most likely to accomplish substantial noise relief.

A. Perimeter Rule

APA supports the elimination of any perimeter restrictions at National Airport. This would permit non-stop flights to any point within the operating departure range from National Airport for aircraft permitted to use the airport. For flights to National Airport, any aircraft permitted to use National could fly non-stop to that airport from any domestic point or point not requiring U.S. Customs and Immigration clearance.

To understand the basis of APA's proposal, one must understand a basic economic fact of the airline industry, which is that the most profitable flights are those which carry the most passengers over the longest distance, non-stop. If the passengers cannot be carried on a non-stop basis, then the next best way of achieving this high profit is to carry them on a one-stop basis.

In order for air carriers to service points which are beyond the 650 mile radius and the seven grandfather cities, they schedule flights to the distant point, with a stop inside the perimeter, whether it is needed or not, to comply with this perimeter rule. We call this process "hop-scotching" to the distant point. This "hop-scotching" results in excess service to the intermediate point and requires more flights to service the distant point, because of the number of passengers that are taking up seats to the intermediate point.

When you view "hop-scotching" from the passengers perspective, there is no incentive not to use National Airport, because of the extra travel time to Dulles and Baltimore-Washington Airports. In most cases, a one-stop flight from National Airport to the distant point with a stop inside the

perimeter is about the same time as a non-stop flight from Dulles, when you add the extra travel time to the airport. Therefore, no incentive has been created for the airlines or passengers to use other airports.

APA has concluded that as long as there is a perimeter restriction, the problem of "hop-scotching" to the distant point with a stop inside the perimeter will occur. As the perimeter is expanded the problem reduces itself, but it exists until the perimeter equals the operational range of aircraft serving National. National Airport has certain physical inhibitors preventing non-stop flights to very distant points. The first is runway length (the longest runway is 6870 feet) which would limit non-stop flights without passenger or weight restrictions to about 1500-2000 miles depending on the aircraft type. The second is the lack of U.S. Customs or Immigration facilities for international flights from Canada, Bermuda, the Bahamas, or parts of the Caribbean.

B. Slot Allocation

APA's proposed elimination of the perimeter rule is closely tied to the proposal for a 20% reduction in slots. If the perimeter rule alone were eliminated it would create pressure to fill each available slot because of the addition of non-stop flights to distant points. The 20% reduction in air carrier slots should produce a significant reduction in noise for local residents, while at the same time not causing a massive disruption to our national and local air transportation system. It is a fair compromise between the FAA's proposed policy with a 10% reduction and the restricted growth policy with a 50% reduction.

To ensure further reductions in aircraft movements at Washington National Airport, APA would propose that if less than 32 air carrier slots per hour are utilized in any given hour for a period of six months, then the slot restriction for that hour will be reduced to that lower figure. This will be a "use it or lose it" policy for the slots, giving local residents a further possibility of noise reduction in their communities.

APA proposes that the allocation of these 32 air carrier scheduled flights be on a financial auction or bidding basis. If that is the case, the flights with the greatest profit potential will win the slots because they will be able to bid the highest for them. Such flights will include high density flights in the following markets: short-haul -- New York and Boston; medium-haul -- Chicago and Atlanta; and long-haul -- Dallas, Houston, Miami. All of these markets because of density of traffic or distance or both would encourage the use of large capacity aircraft. It is these larger aircraft which are or

will be the quietest. Therefore the slot reduction and allocation system will encourage the use of the quietest, most cost-effective aircraft available.

C. Aircraft Limitations

APA proposes the use of two- and three-engine wide-body aircraft in addition to those aircraft currently permitted. This would include present wide-body aircraft, the L-1011, DC-10, and A-300 Airbus. It would also include proposed aircraft such as the 767, 757, and A310. Current wide-bodies are quieter than current narrow bodies and these future aircraft will be quieter yet. The introduction of these new aircraft will provide noise relief to local residents.

The use of these quieter, large capacity aircraft should be in conjunction with other aspects of APA's proposed policy to effectuate the greatest benefit. Elimination of the perimeter restriction, no passenger limit, and a 20% reduction in slots with allocation by bidding will all work to reduce noise at National.

APA opposes the proposal to only allow wide-bodies if they are substituted for twice the number of narrow bodies. This proposal will be a disincentive for quieter aircraft and will slow noise relief for local residents. The introduction of a wide-body aircraft may result in an airline dropping two or more noisier narrow body aircraft, but that will occur if it is to their economic advantage. The Washington National Airport policy should encourage that development by the reduction in slots and removal of the perimeter restriction. To legislate a two-for-one substitution may result in no noise relief, because airlines may not want to make such a substitution at the time of introduction of the wide-body.

D. Scheduling and Operating Hours

APA does not oppose the FAA's Proposed Policy in this area: Scheduling Hours -- 7:00 a.m. until 9:30 p.m.; Operating Hours -- 7:00 a.m. until 10:30 p.m., closed to all traffic except emergencies 10:31 p.m. until 6:59 a.m. Although APA is generally opposed to airport curfews because of the havoc they create for a national air transportation system, we do not oppose this curfew because of problems peculiar to the location of National Airport, and because both Dulles and BWI are available 24 hours a day.

E. Passenger Limit

APA proposes that there be no passenger limit at National Airport. In effect, passenger limitations will be created by the 20% slot reduction in air carrier schedules. A passenger

limit at the airport may be a disincentive to quieter, new generation aircraft, which are larger than aircraft currently serving National. And after all the primary problem to the local residents is noise, not airport congestion.

OPERATION OF APA'S PROPOSED NATIONAL AIRPORT POLICY

If APA's proposed policy were instituted, the scenario most likely would be as follows. Many flights which are now operated to points beyond the 650-mile perimeter and the seven grandfather cities, would be converted to non-stop service. Flights to intermediate points which now serve as the first stop of the longer trip would lose service from National Airport, especially with the 20% slot reduction. Cities with increased service from National might include: Ft. Lauderdale, Birmingham, New Orleans, Kansas City, Dallas/Ft. Worth, Houston, and Denver. Cities with reduced service from National because of non-stop service to distant points might include: Memphis, Nashville, Atlanta, and St. Louis.

Assuming that the demand for these intermediate points remains the same, airlines will have two choices: one, is to continue to offer service from National as a stop on a longer flight, or second, make flights to these points available at Dulles or BWI. Because of slot restrictions and the fact that it is a competitive disadvantage for one airline to offer one-stop service in competition with other non-stop service, these flights will most likely be moved to the other airports.

For the passenger traveling to these intermediate points, there will be no choice between National and Dulles or BWI. The only way to get to that destination is to use one of the other airports. This will force many local residents and travelers to Washington to utilize Dulles or BWI airports. It is expected that once passengers start to use these airports they will realize that it is not as far or as difficult to use as they have been led to believe. In fact, once air traffic increases at Dulles and BWI, a better ground transportation infrastructure will develop to support the increased demand for ground transportation to those airports.

One other factor will force more flights to Dulles and BWI. That is the slot reduction coupled with a financial bidding system for slot allocation. Because flights to distant points tend to be more profitable as well as flights to high density points in the short-haul and long-haul market, these flights will get the highest bids for slots. This will squeeze out many current flights to lower density points within the current 650-mile perimeter. As long as there is sufficient demand for service from Washington to these points, flights to these destinations will also be moved to Dulles or BWI.

What will result from APA's proposed policy will be the movement of many short-haul and medium-haul flights to Dulles. With the loss of these flights, National will cease to be a "connecting flight" facility, because such facilities require a plethora of such short and medium flights for connection purposes. Dulles then has the potential for becoming such a connecting facility. It is well-suited for that role because: (1) it can handle the excess flights and accompanying noise; (2) it has space for the extra aircraft; and (3) use of mobile lounges at Dulles obviates the need for terminal expansions to handle the increased traffic.

National Airport will become an "Origin and Destination" airport, in that it will serve travelers whose trips originate or terminate in Washington. As more flights are forced to Dulles, some long-haul and medium-haul flights might be moved back to Dulles to handle all the connecting traffic plus local traffic. As wide-bodies are introduced to National, airlines may be economically forced to cut back on narrow-body flights there. This will be not only because of the continual rise in the cost of fuel, but also because of deregulation, airlines may not want to dedicate an inordinate number of aircraft to markets served from or to Washington. When this natural attrition occurs, the "use it or lose it" for slots will further cut back on the total number of flights.

APA OPPOSES THE FAA'S FOUR ALTERNATIVE POLICIES

The four alternative policies for National Airport proposed by the FAA each fail to effectively reduce the problem of excessive noise in and around National Airport. APA's analysis of each policy is as follows:

A. Proposed Policy

1. The passenger limit discourages the use of quieter, wide-body aircraft and new technology aircraft.
2. Scheduling and operating hours are acceptable.
3. Air carrier slot reductions only amount to 10%, an insufficient amount to satisfy local residents.
4. Wide-body aircraft should be allowed.
5. Both the 650-mile and 1000-mile perimeters trap unnecessary flights at National Airport to points inside the perimeter that serve as the first stop of a flight to the distant point. Flights "hop-scotch" inside the perimeter to get to points outside the perimeter. The Proposed Policy will not eliminate this. There will be less of such problems with the 1000-mile limit, but the problem will not be eliminated.

B. No Policy Change

1. Unlimited passenger growth is unacceptable to the local community without restrictions on slots and hours of operation.
2. Scheduling hours and operating hours have created problems.
3. Slots are too high for local residents.
4. Aircraft limitations against wide-bodies prevent quieter aircraft from using National Airport.
5. The 650-mile perimeter plus the seven grandfather cities traps excessive flights at National. The seven city exemption is discriminatory.

C. Expanded Growth Policy - exacerbates an already bad situation and is therefore unacceptable.D. Restricted Growth Policy

1. 16 million passenger limit inhibits use of quieter aircraft.
2. Scheduling hours and operating hours do not improve things as much as the FAA Proposed Policy.
3. Air carrier slot reduction of 50% to 20 schedules per hour is too restrictive a change. It would create undue hardships on airline passengers and airlines. It is most likely politically unfeasible for an airport so frequently used by Members of Congress.
4. Wide-bodies should be used.
5. More stringent perimeter limitations will trap excessive flights at National.

CONCLUSION

The Airline Passengers Association feels that its proposed policy is the most reasonable compromise of all proposals because it meets most of the needs of most of the parties involved: local residents, airline passengers, the FAA, and local governments. It calls for a 20% reduction in slots at the airport. It creates an economic and operational incentive for the use of Dulles and BWI airports. It will create an incentive for the use of new technology quieter aircraft at National Airport which will have the effect of reducing the noise problem for local residents. The total result of APA's proposal will be: less planes at National Airport; more planes at Dulles and BWI; and substantially less noise for residents around National Airport.

STATEMENT TO THE SUBCOMMITTEE ON AVIATION
OF THE COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
HOUSE OF REPRESENTATIVES, U.S. CONGRESS, by

Elizabeth E. Van Staaveren
7115 Burtonwood Drive
Alexandria, Virginia 22307

June 19, 1980

These comments are related to the proposed policy for metropolitan Washington airports, as published by the Federal Aviation Administration in the Federal Register on January 21, 1980.

I have lived directly under the flight path for southbound departures from Washington National Airport for 6 years; also quite a few returning aircraft overfly my house. However, I am interested in the question of airport policy as much from the general viewpoint of what is best for the Washington area and the nation as I am from a purely personal standpoint.

It will greatly benefit the public to have easy access to the statements of the various parties concerned with operations at National Airport, and I appreciate the opportunity to have my views included in the record of these hearings.

The problem of National Airport is that it is an extremely busy airport operating near the center of a large metropolitan area. All airports should be on the fringes of cities and towns; in most cities and towns throughout the world they are so placed. There is no valid reason why Washington, D.C. should be different in this respect.

In the Supplement to the Draft Environmental Impact Statement issued by the FAA as a supporting document to its proposed policy, the rationale for expansion of National Airport is presented as a "national interest" versus the position of local citizens who want no growth. (p.II-12 and elsewhere). There is no national consensus that it is in the best interests of the country to have an airport operate as National Airport does, and in its present location, regardless of all other factors. Talk of a "national perspective" or "national interest" is misleading and lends unearned dignity and importance to the desire to retain National Airport. The true "national interest" requires only that reasonably quick access from an airport to downtown Washington and Capital Hill be provided, not that the airport must be the present WNA.

The factors responsible for the high concentration of flights at WNA are elsewhere identified more mundanely and specifically as "travelers whose trips originate or terminate near downtown Washington, coupled with the highly competitive forces within the airline industry." (p.II-9). There is no justification for allowing these two groups to continue to use National Airport considering the human and property costs to residents near the Airport and in the flight paths, when satisfactory alternatives could be provided without hardship to anyone.

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I. PROPOSED POLICY FOR METROPOLITAN WASHINGTON AIRPORTS

1. I am glad to see that under the proposed policy the FAA would undertake an effort to promote and improve public transportation to Dulles Airport. This is the crucial step in reducing traffic at National Airport. However, not enough attention is given to this point in the proposed policy. More definite, detailed planning toward this objective is needed, with close cooperation and communication between ground transportation planning agencies and airport agencies. The Secretary of Transportation should appoint a special representative to coordinate planning for improved ground transportation to both Dulles and Baltimore-Washington International Airport, but especially to Dulles, as present public transportation there is totally inadequate and is the major reason for continued pressure to retain National Airport.

Frequent express bus service from Ballston metro stop to Dulles and from New Carrollton to BWI could be inaugurated immediately. Sections of or an open corner of Metro cars could be left available for baggage of air travelers; at Ballston and New Carrollton stations, porters and/or luggage carts could be available for the convenience of air travelers in transferring to the buses. Also there could be clearly identified "satellite" air terminal stations wherein the citizens of various areas can check their baggage ahead of time and travel to Dulles unencumbered with their baggage. This is done in Paris and other large metropolitan areas of the world.

Planning for the extension of Metro to Dulles should begin now. Ground transportation planning is primarily a local activity, but insofar as it is possible for the Department of Transportation to help with technical and financial assistance, the Department should do so. There are many ways in which the Department could assist.

Even now there is one small but extremely useful and relatively inexpensive step the DOT could undertake to promote the use of presently-available public transportation to Dulles. The DOT could print leaflets giving all details about present bus and limousine service to Dulles: exact locations of pickup and discharge, schedules, fare rates, etc. These leaflets could be distributed to the public through airline ticket offices, airline ticket counters at National and Dulles airports, travel information bureaus. The leaflets could also contain detailed information, with rates, about the parking facilities available at Dulles for leaving one's car while traveling by air from Dulles. Inasmuch as the

DOT operates these Airports, it is the DOT's responsibility to provide adequate information about access to the Airports, and this has not been done so far.

2. No program of growth should be undertaken at National Airport. The reduction in rate of growth announced is so small as to be hardly even a token. It is questionable whether the thousands of persons presently suffering from the noise and air pollution of National's operations will be able to detect much difference. Furthermore the policy statement projects that 10 years hence National will be almost as busy as it is now. This is entirely unacceptable. The level of activity at National could be and should be sharply reduced within the next year, and by 1983 the Airport should have become once more the riverside park it was in 1940.

So many problems that have occupied hours of planning, administrative, and citizen time could be solved easily by simply transferring all operations of WNA to Dulles or BWI and turning the land back to the Park Service. This is the only real answer to a controversy that will never end until the FAA, Congress, and the airline and aviation industries face the fact that WNA is an airport whose time has passed. It has served in varying degrees of adequacy for 40 years, but it is overdue for retirement now. A remodeling or rebuilding in its present location should not be attempted. This location is simply not suitable for an airport.

3. The plan to reduce operating hours at National is commendable. It is hoped that the limitation of operating hours to 7 a.m.-9:30 p.m. will be strictly adhered to. The present "curfew" from 10 p.m. to 7 a.m. has been only loosely observed; regular operations actually take place from 6:30 a.m. to 11 p.m.; jet flights are moving at low altitudes over densely populated residential neighborhoods almost constantly between these hours. A reduction in scheduled hours of operation is certainly desirable, and careful policing of the curfew should be enforced. Furthermore there should be a period of rest on weekends, as recommended by the National Capital Planning Commission.

4. I concur in the recommendation of the Coalition on Airport Problems (CAP) that if wide-bodied aircraft are brought into National, they should be introduced only on a 1-for-2 basis--the requirement that an airline remove two narrow-bodied jet operations from National for every wide-body jet introduced. FAA's own noise statistics show that wide-bodies are not significantly quieter than the 727-200's and DC-9's which use National now. They are noise reducers only if they take more aircraft out of the sky than they add.

5. The perimeter of service should not be extended beyond 650 miles, and the exemption for the grandfather cities should be cancelled now. Tickets for cross-country or any trips beyond the 650 mile limit should not be permitted to be sold if they involve flights into or out of National; in this way WNA could be held to truly short-haul operations. The FAA's own Environmental Impact Statement shows that noise would increase if service is extended to a 1,000 perimeter, because aircraft flying greater distances require more fuel, resulting in lower, noisier takeoff profiles.

6. I endorse the recommendation of the Council of Governments and Virginians for Dulles that a Regional Advisory Board be established to deal with

aviation policy questions in the metropolitan area, so that the views of the residents may be properly represented in the decision making process.

The history of the management of WNA and Dulles Airport under FAA indicates that the Federal Government should not be allowed to operate airports directly. Airports should be controlled by the local governmental jurisdictions in the communities where the airports are located. The FAA has never sufficiently heeded or respected the needs of the residents in this area or even the expressed wishes of the local governmental bodies. In a supposed democracy, this situation is a bitter irony.

II. "GENERAL AVIATION" AT NATIONAL AIRPORT

7. National Airport should be closed immediately to private aviation (so-called "general aviation"). No airport should be operated where National is presently located, and if there has to be one, it should be open only to public aviation. This would be one very good way to reduce activity there and improve safety. It is well known that the mix of private planes and large air carriers is dangerous and has caused numerous accidents.

The pleas of such organizations as the General Aviation Manufacturers Association, and the Aircraft Owners and Pilots Association, to keep National open all night are totally without merit. Their claims that general aviation planes are quiet and environmentally acceptable are ridiculous; in fact they insult our intelligence. I have lived under the flight path for south-bound departures from WNA for nearly 6 years; I am only 5 miles from the Airport; the planes turn and climb directly over my house repeatedly, often within seconds of each other. I have listened to thousands of airplanes, and they are all noisy. Even the smallest propeller or jet airplane is more than loud enough to wake a person up in the middle of the night. This is not only my own reaction but that of most of the other residents in my community.

Senator John Glenn was quoted in the newspaper as saying he often flies his own plane into National Airport at midnight or 1 a.m. and his plane is so quiet it can't be heard inside a house "even with the radio or TV turned off," implying that many persons are still listening to the radio or TV at these hours which is almost certainly not true. Most adults living in the flight paths work and have to go to bed well before midnight or 1 a.m. If the airport is open all night, quite a few planes will be coming in even later than 1 a.m., and in spite of Senator Glenn's optimistic statement, these planes can be heard inside a house and they are disturbing. FURTHERMORE, if planes are allowed to land at night there will be inevitable pressure to allow them to take off all night also. We have suffered many sleepless hours because of airplanes flying around overhead at 1, 2, 4 or 5 a.m. There is no excuse for their being allowed to do so in a densely populated metropolitan area such as this! Let the Post Office truck its mail to Dulles or BWI; the various Senators and Representatives would be better off and have clearer heads if they passed the night where they were and came into Washington the next day; deliveries of miscellaneous products, parts and equipment for local industry which are flown around at night are not that essential!

It would be revealing to have a published list of the persons and organizations flying into and out of National at night over a 6-month period with their origins and destinations, and the purposes of the trips. I challenge the need for such trips or the utility of them for the public good. Any truly essential trips by private airplanes can be made from airports other than National—Dulles, BWI, Andrews Field, Manassas, or elsewhere.

The desecration of the night caused by private airplanes serving the wealthy, the powerful, and the privileged, is one of the most galling results of the Wright brothers' invention.

III. SUPPLEMENT TO THE ENVIRONMENTAL IMPACT STATEMENT

8. The chief impression left with me after reading this Environmental Impact Statement is that a deliberate attempt has been made to understate both the noise and air pollution impacts of Washington National Airport, particularly those impacts on residential areas.

One of the most offensive features is the frequent use of maps purportedly showing the noise-impacted areas. These maps are grossly misrepresentative of the true situation, at least in the areas south of the Alexandria city limits. The entire Mt. Vernon area of Virginia is seriously and adversely affected by aircraft noise from Washington National Airport, also the Potomac River at least as far south as Ft. Belvoir. There is no attempt to assess this damage; there is not even a paragraph recognizing that a problem exists.

The noise measurements and measurement-terms used in the EIS are poorly described. Readers of an EIS should not have to perform additional research to understand the terminology used in the report. Three different kinds of noise measurement techniques are used (dBA, Ldn, NEF) to refer to similar sites or events; none is adequately discussed in language for the layman and nowhere are any of these related to the measurement standards used in the monthly Aircraft Noise Monitoring Report, which adds a fourth technique the layman must try to understand. This monthly Report documents actual aircraft noise readings at 23 monitoring sites along the flight paths of WNA and Dulles, and shows that the noise problems are serious well beyond the perimeters described in the EIS.

Also, the discussion of air pollution impacts of WNA is very sketchy and inadequate. Measurements were made of air pollution at only 10 receptor points, all of them extremely close to the Airport. Measurements should be made under the flight paths of the airplanes approaching and departing WNA, at several points between 4 and 10 miles from the Airport. Persons living under the flight paths are exposed to obvious, observable sooty, grimy fallout from airplane exhaust. They breathe it in the air around their homes, see it accumulate on their porches and patios, on the leaves of evergreen and deciduous plants in their yards, watch it darken and erode the paint on their houses.

To ignore these environmental impacts is either shockingly obtuse or consciously evasive.

What are the long-term physical and mental effects on people of continuous exposure to high levels of aircraft noise and exhaust fumes? Nowhere in the report is this question addressed. It is an important part of the environmental impact.

There are many details throughout the EIS that should be questioned. Unfortunately I don't have the time to make a page-by-page examination of the document and debate or refute the numerous statements and conclusions that appear suspect to me.

I concur in Mr. Sigurd Rasmussen's opinion stated at the March 20 FAA public hearing, that the EIS is the most devious Government document he had ever read. It is certainly not an impartial presentation; I do not believe it is even an honest one.

Following are comments on specific sections.

Table II-2. Identification of organizations, government agencies, and members of Congress in each category should be made. This brief summary is insufficient. The knowledge of exactly who stands for what is important to an understanding of this complex controversy.

Page III-5, 10. Discussions of the retrofitting program assume more progress than will actually take place. There has been a cutback in the timetable for retrofitting, unfortunately.

Page III-23 sq. Park Lands and Historic Sites. The EIS fails utterly to recognize the full range and gravity of the effects of WNA's operations on park lands and historic sites.

All recreational uses of the Potomac River and adjoining parkland at least 10 miles north and south of the Airport are very adversely affected by the Airport's operations: boating, cycling, picnicing, jogging, games, sports, concerts, outdoor theater and meetings. One of the city's greatest natural assets is the Potomac River and nowhere within its several-miles' course through the heart of the city is it possible to enjoy the beauty and peace that would otherwise be found there, because the thunder of jets overhead is constantly assaulting the eardrums and spewing out polluted exhaust fumes.

The dignity of historic sites is lost in the roar of jet engines. The noise levels documented in the EIS at such places as Arlington National Cemetery, Arlington House, Alexandria historic district, Waterfowl sanctuary, Lady Bird Johnson Park, Lincoln Memorial, are much too high and to project only a 30 percent reduction under the FAA proposed policy only underscores how hopeless it is to try to operate an airport at WNA's present location.

Page III-24 sq. Social and Economic Conditions. The discussion of employment and business effects of WNA is on the fringes of pertinence in an EIS. Employment and business effects are basically economic, not environmental subjects. The economic impact of WNA's operations would be very nearly the same probably at any location. Shifting flight operations away from WNA to Dulles and BWI would simply move the economic and business impact to other

parts of the area. It is very unlikely that any businesses presently near WMA would be hurt, considering the strength of the Washington metropolitan area's economy, based on federal government operations, large volume tourism, and business-government liaison activities.

Those few businesses that are directly tied to the Airport such as taxis and car-rental firms, are highly mobile and could be relocated easily. The economic benefits described in the EIS to local governments, i.e., increase in local tax base, are questionable. Far greater economic benefits would accrue to them if the Airport did not exist, because the environment surrounding properties in Arlington and Fairfax Counties, Alexandria, Washington, and elsewhere would be so vastly improved that they would become more desirable and their value would increase because of the improved environment.

Page III-28 sq. Energy. The claim is made that WMA is energy-efficient in terms of ground transportation. In the overall picture of what is best for the city and the country however, that is a very minor factor. The longer route to Dulles or BWI would give tradeoffs that are fully compensatory. For one thing, the current fuel loss to delayed landings at WMA could be saved by diversion of flights to Dulles and BWI.

The mathematics of the estimates of additional fuel required for transportation of passengers to Dulles and BWI is untenable because it assumes travel by private car at 1.45 vehicle occupancy rate. Many other means of transportation could be provided that are much more energy-efficient.

Page IV-2. Noise Monitoring. The Noise Monitoring program is a very commendable step toward documenting actual noise levels along the flight paths of the Airports. Objective scientific data of this sort is essential to constructive discussion of the problem and gives a firmer basis for working out possible solutions. Residents along the flight paths appreciate the introduction of the system and want it to be retained and improved. The monthly reports are valuable records which have been very helpful in increasing understanding and awareness of the aircraft noise problem.

However, the explanation of the measurement methods and the comprehensiveness of the records themselves leave much to be desired. For example, I think the report should include data on the total number of flights passing near each monitor during the month, and the time of day or night, by 2-hour periods.

I wonder about the location of the monitors based on that in Marlan Forest, which is about a block north of the usual direction of the planes that overfly this neighborhood. I think the monitors should be placed directly under the flight paths.

IV. CONCLUSION

9. Can one imagine Paris or London with large jet airplanes swooping overhead at low altitudes almost constantly throughout the day, and far into the evening hours? How many of the capitals of the world tolerate such conditions? Why should we be less civilized in this respect than others?

I have heard the people who advocate reduction of operations at WNA called "spoiled children." But just who are the "spoiled children" in this situation? They are really these persons who refuse to give up even a few minutes of their time in exchange for a greatly improved environment for thousands of residents and visitors to the Nation's capital.

The answer to the problem being addressed by this Committee is to provide immediately, rapid ground transportation to Dulles and BWI airports, and to close Washington National Airport forthwith.

Thank you, Mr. Chairman and Committee members, for holding these hearings and providing a public forum for the presentation of all viewpoints.

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June 7, 1980

Statement of Alexandria, Virginia Old Town Civic Association Concerning the U. S. Department of Transportation's Proposed Policy for Metropolitan Washington Airports. Submitted June 11, 1980 to the Subcommittee on Aviation of the House Committee on Public Works and Transportation.

The Alexandria Old Town Civic Association represents 500 home owners and other residents living in that part of Alexandria, Virginia that adjoins the Potomac River to the east and is directly south of Washington National Airport (WNA). The area includes the original Colonial port city of Alexandria established in 1749. Approximately 900 buildings originally constructed in the period 1750 to 1850 remain standing in the area, and most are in use as residences or places of business. This rich national heritage has been preserved almost exclusively through the private efforts of individual property owners and their civic organizations, with little Federal or State aid or involvement.

Because of its close proximity to WNA and of the preferred flight path system enforced by the FAA, Old Town Alexandria also happens to be the Washington metropolitan area neighborhood that experiences the greatest amount of noise and air pollution resulting from WNA operations. Most homes, business places, and public buildings in Old Town are located in the so-called 30 to 40 noise exposure forecast zone, as delineated by the FAA. In this zone, according to the agency, "residential development is not con-

sidered a suitable use," "open air activities and outdoor living (is) affected," and "construction of auditoriums, schools, churches, hospitals, and theaters and like activities should be avoided..." (Table III-1, Supplement to the Draft EIS for a Proposed Metropolitan Washington Airport Policy, January 15, 1980). This warning is, of course, irrelevant insofar as Old Town is concerned. The majority of the area's residences, churches, and other public buildings were in place long before the expansion program at WNA was begun that gradually but inexorably in the period 1950 to 1970 came to impact Old Town with the noise levels the FAA itself now admits to be intolerable for settlement.

Each and every day of the week from 7 a.m. to 11 p.m., no less than 500 commercial air carrier, commuter, and general aviation aircraft are, depending on wind conditions, either taking off from or approaching WNA along a flight path that places them over the waterfront river area of Old Town. Of this number, about two-thirds are two and three engine turbojet carrier aircraft. Aircraft traffic is not, however, distributed uniformly throughout the 15 or so hours WNA is open each day. During the busiest periods, e.g. late afternoons and early evenings, an aircraft will land or take off in the airspace near the waterfront every two or three minutes. The effect on Old Town residents of heavy and constant turbojet noise at such times can only be understood if experienced. When aircraft are taking off from WNA along the southern leg of the Potomac River flight path, the level and pervasiveness of noise over much of Old Town is nearly intolerable. Gardens are unusable. Windows of houses and offices must be closed. Normal human voice levels must be raised to a shout to be heard. This is not, it should be noted, an infrequent condition. Because of the

preferred flight path prescribed by FAA, Old Town Alexandria is one of the Potomac River neighborhoods that in the words of the Washington Coalition on Airport Problems (CAP) "has been asked to shoulder the entire noise burden of WNA." (Comments on Metropolitan Washington Airports Policy, April 15, 1980, p. 65)

This is not all. As any observer can testify, jet aircraft in flight deposit huge amounts of pollutants in the atmosphere. Although aircraft using WNA are generally required to fly over the Potomac River when landing or taking off, wind conditions and other factors scatter such pollutants across neighborhoods, such as Old Town, that adjoin the river. There is also the accident hazard, little publicized but always on the minds of individuals closely familiar with WNA operations. The crowded skies around WNA are, to be blunt, an invitation to disaster, not only for aircraft passengers but also for people living in communities adjacent to WNA.

Under pressure from Washington metropolitan area citizens, USDOT has proposed a long-range policy for the future operation of WNA and Dulles International Airport (DIA). The policy has been touted as one that will reduce growth at WNA and shift traffic to DIA. In reality, it will not accomplish the former, while the latter will be of little consequence given the continuing role of WNA as the airport among the three serving the Washington-Baltimore region that will handle two-thirds of the commercial passenger traffic for at least the next 10 years.

The cutback of four aircraft slots per hour, proposed by DOT for WNA, will reduce noise and pollution in Old Town scarcely at all. At the same time, the introduction of wide-bodied aircraft, increased small commuter and general aviation traffic, and extension of the 650-mile perimeter

rule will actually expand the annual numbers of passengers utilizing WNA by 20 percent, from the current 15 million to 18 million. The proposed policy will also require rehabilitation and rebuilding of groundside facilities at WNA, as well as lengthening of runways.

For the citizens of Old Town, it all adds up to turbojet noise inspection at least at or close to current levels; increased air pollution; disruption of the two major north-south highways serving the Old Town area as WNA groundside facilities are rebuilt and generate a huge expansion of traffic; and degradation of riparian areas adjacent to Alexandria as runway construction is extended into the Potomac River. The proposal of DOT to make mandatory the present voluntary late evening curfew on scheduling flights into and out of WNA while desirable, appears merely a sop to neutralize opposition in WNA's impacted neighborhoods.

It is way past time that the Government and the carriers face up to and act on the inherent limitations of WNA as a national airport. It was built in 1941 to handle a limited number of small piston-engine aircraft on a space that then was considered to be in a sparsely settled part of the Washington area. It accommodated principally local World War II generated military and other government traffic. In spite of this, over the years groundside facilities at WNA have been expanded and enlarged in willynilly and unplanned fashion, while the carriers have inexorably squeezed the maximum traffic into and out of the airport to the outermost limits of FAA control and oversight. The result is one of the most congested, polluting, and dangerous airports in the nation, if not the Western world. Were WNA operated by a local government or airport board anywhere else in the U.S., DOT would have long since forced a severe cutback, if not a closure.

Nothing less than a complete reconstruction of WNA costing billions of dollars and rendering central Washington and Virginia neighborhoods useless, except for the grossest industrial and commercial purposes, can position WNA for the kind of expansion in passenger load anticipated under the DOT plan. The facility already handles far more carrier, commuter, and general aviation traffic than is suitable and safe given its limitations and original purpose. To even consider a 20 percent annual increase in the number of passengers accommodated without calling at the same time for an enlargement of airport facilities that would be one of the most costly and environmentally damaging construction projects ever undertaken in the Washington metropolitan area, is to put it simply, unrealistic, if not downright dishonest.

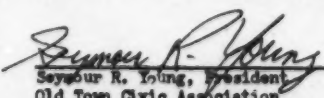
Sooner or later the Government and the carriers must face the fact that WNA operations will have to be cut back. CAP has called for a policy that includes an immediate end to growth at WNA; a 50 percent reduction in jet slots; a more restrictive and official curfew; mandatory noise abatement techniques; provision of regular and convenient ground passenger service to Dulles; retention of the 650 mile limit; modification of preferred flight paths so that residents of a few neighborhoods only, such as Old Town Alexandria, are not forced to pay the external costs of WNA operations for the entire Washington-Baltimore metropolitan area; and a permanent citizens' advisory group. The Civic Association of Old Town Alexandria endorses these recommendations.

If DOT persists in the expansion policy at WNA and, at the same time, is unable to develop a program of modifying the preferred flight path to lessen the WNA noise and air pollution burden on Potomac River neighbor-

hoods north and south along this path, the agency will force citizen groups presently bearing this burden to seek relief in the courts. These groups are not likely to be as quiescent in the 1980's as they have been in the past, or to tolerate the slow but steady buildup of traffic at WMA as has previously occurred. The Congress itself has provided such citizen groups with new statutory tools to assert their and the community interest. The courts also have begun to acknowledge the inequity and loss suffered by innocent parties who are afflicted by operations at nearby airports.

The intense interest and concern expressed by individuals and citizen groups in the Washington metropolitan area over the proposed DOT policy will not disappear should the agency hand down an imperious decision setting forth what it desires the Washington airports policy to be. The clearly stated objectives of FAA governing airport management and operations are contradicted by the present proposed policy. The agency's HES supplement is faulty and inadequate on several grounds. The preferred flight path procedures are clearly discriminatory. In short, there are many reasons, such as the foregoing, for citizens to challenge the government in the courts.

The people in WMA's impacted neighborhoods will not go away. They are a third party in this matter, along with the DOT and the carriers, and deserve an equal voice. It would be better for all concerned if the three parties now could sit down and work out a reasonable and rational plan for future WMA operations that could at least be tolerated by all the parties. Absent such a plan, there will be nothing but costly disputes and delays for the indefinite future, which could result in permanent impairment.


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